Ministry of Housing, Communities & Local Government

THE TOWN AND COUNTRY PLANNING (CROWN DEVELOPMENT) (URGENT APPLICATIONS) (PROCEDURE) (ENGLAND) ORDER 2025.

OFFICIALS' APPRAISAL REPORT – MOD BICESTER

APPLICATION NUMBER	PCU/RARE/C3105/3378843
APPLICATION TYPE	FULL

APPLICANT	Secretary of State for the Home Department ("SSHD")
PROPOSAL DESCRIPTION	The temporary change of use of the former defence storage and distribution centre site in connection with the phased provision of non-detained asylum accommodation. The Proposal comprises the retention and change of use of Building A6, demolition of existing buildings and structures and vegetation clearance, the erection of new modular accommodation, and the provision of space for associated health and welfare facilities, site infrastructure, wastewater infrastructure, roads, access ways, security infrastructure, parking, staff accommodation and facilities, and open space and recreational areas, to accommodate up to 1,256 Service Users.
SITE ADDRESS	MOD Bicester Site A, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE
LPA	Cherwell District Council ("the LPA")
LOCAL MP	Calum Miller MP (Bicester and Woodstock – Lib Dem)
RECOMMENDATION	**GRANT** planning permission subject to conditions.

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1. INTRODUCTION

1.1. This is the officials' planning appraisal report prepared for the Secretary of State for Housing, Communities and Local Government ("SSHCLG") in respect of an urgent Crown development application submitted by the Secretary of State for the Home Department ("SSHD") under section 293B of the Town and Country Planning Act 1990 ("TCPA") and article 6 of the Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025 ("the 2025 Order").

1.2. The application was accompanied by a Statement on National Importance and Urgency, prepared by the Home Office ("HO"), as required by article 6(1)(c)(iv) of the 2025 Order. The Statement explained that the proposal is intended to provide a flexible and operationally resilient component of the nationally managed asylum accommodation estate, enabling the HO to respond to fluctuating demand, occupancy pressures and movement through the estate.

1.3. The Statement, together with advice from officials, was placed before the Minister of State for Housing and Planning ("the Minister") for the purposes of the section 293B(6) "gateway" decision. The material before the Minister explained that the development would make a material contribution to the nationally managed asylum accommodation estate and the discharge of the SSHD's statutory asylum-support functions. It identified the continuing pressure on accommodation capacity, including a shortage of single occupancy provision, continued reliance on hotels and other contingency accommodation and the need to maintain contingency headroom and operational resilience within the estate. On 13 July 2026, having considered that material, the Minister concluded that the development was of national importance and needed to be carried out urgently. He agreed that the application should proceed as an urgent Crown development application.

1.4. The Minister's conclusion that the national importance and urgency criteria (set out in the Crown Development Written Ministerial Statement, 13 February 2025) were met is distinct from the planning merits assessed in this report. This report assesses the main planning considerations arising from the proposal, based on the application material, consultation responses and representations received.

2. PROPOSAL

2.1. The proposal seeks full planning permission for the temporary change of use (for a period of 10 years) of the former defence storage and distribution centre site (MOD Bicester Site A) in connection with the phased provision of non-detained asylum accommodation. The full description of development is in the table above. Any continuation, expansion or material alteration beyond the scope or duration of what is being sought would require a further planning application. Although permission is sought

for a fixed term of 10 years, officials have treated the development as permanent for the purposes of assessing its planning impacts. The time-limited nature of the proposal has not been relied upon to reduce the significance or weight of impacts arising during that period.

2.2. The proposed development would be delivered in three phases. [redacted] The accommodation would be provided predominantly through use of modular units, supported by ancillary buildings and facilities including dining, kitchen, laundry, healthcare, reception, staff office, recreation and multi-faith provision, toilet and shower facilities, and medical isolation accommodation. The proposed phasing plan is at **Annex B, Figure 6.**

2.3. The operational model is intended to support managed movement of Service Users through the asylum accommodation estate. The HO describes the proposed facility as short-stay accommodation intended primarily for newly arrived single adult male asylum seekers, who would not be detained on the site. The application does not propose a maximum period for an individual Service User's stay. The expression "short stay" is, therefore, an operational description rather than a limit to be enforced on individual occupation. Similarly, the permission would not restrict potential occupation to a specific group of Service Users.

2.4. The proposed facility would operate on a substantially self-contained basis. Accommodation, catering, laundry, welfare support, healthcare, recreation, multi-faith provision, administrative services and staff facilities would be provided on site. Service Users would not have access to private vehicles and necessary off-site journeys would principally be undertaken using managed transport. The site would operate with controlled access, security staffing, safeguarding arrangements and liaison with relevant health, police, local authority and community partners. This operating model is relevant to the assessment of transport, safeguarding, community cohesion, public safety and local-service impacts below. It reduces, but does not remove, the potential for off-site effects, which are assessed based on the residual impacts remaining after the model and recommended controls are considered.

2.5. The proposed development would make use of existing hardstanding and previously developed areas within the site. The HO has confirmed that the southern access from the B4011 could serve as the principal operational access, with the northern access used for emergency or contingency purposes. The HO's preference is that the permission should allow both accesses to be used, subject to the approval and implementation of any works necessary to ensure that each access is safe and suitable for its intended use. The respective roles of the accesses, including arrangements for staff, visitors, managed Service User transport, coaches, service and refuse vehicles and emergency vehicles,

would be determined through the Highway Safety and Access Scheme required by condition. The development would include on-site car, cycle and motorcycle parking, servicing areas, coach and minibus arrangements, internal access roads, security infrastructure, external lighting, landscaping and boundary treatments. The proposed site layout and access arrangements are shown at **Annex B, Figure 7**. **Figure 8** shows the proposed accommodation, retained buildings and supporting facilities.

2.6. The proposed new modular accommodation buildings would be double stacked and no more than two storeys. The accommodation was originally described as having a principal building height of no more than 6 metres. On 6 November 2026, the Home Office clarified that 7 metres above finished ground level was now proposed. How this figure was arrived at is further explained in paragraph 5.3 below.

2.7. The application fixes the principal parameters of the development but leaves elements of detailed layout, design, infrastructure and operation for subsequent approval. Officials have assessed the realistic worst-case effects capable of arising within the submitted parameters. Officials have considered the clarified accommodation height through their assessment of landscape and visual effects in section 10 and the updated EIA screening assessment described as paragraph 5.4. Condition 4 limits the modular accommodation buildings to two storeys and 7 metres above finished ground level. Conditions 4 and 8 require approval of coordinated existing ground, finished ground, floor and maximum roof levels against a common datum and construction in accordance with those approved levels. Where the detailed form of development remains uncertain, the recommended conditions define the limits within which it may come forward, requiring approval and implementation of the necessary mitigation before relevant works or occupation. Officials are satisfied that the matters reserved for later approval concern the detailed implementation of the assessed development and would not permit a materially different scheme or defer an assessment necessary to determine whether planning permission should be granted.

3. SITE DESCRIPTION

3.1. The application site extends to approximately 10.22 hectares and forms part of the wider MOD015 Site A, which extends to approximately 50 hectares. It is part of the former Central Ordnance Depot Bicester, constructed between 1941 and 1943 as a major military storage and logistics facility. The site is largely vacant and most of the buildings have been mothballed for several years. Plot 1, however, remains subject to a storage lease and is accessed daily. [redacted] Officials consider, therefore, that the underlying lawful military storage and distribution use has not lapsed. There is no public access to the site. Access is controlled through existing gated estate roads.

Location

3.2. The application site is located off the B4011, between the villages of Upper Arncott and Piddington in Oxfordshire, approximately 4.8 kilometres south-east of Bicester. Agricultural land lies to the north, east and south, with the B4011 forming the western boundary. Piddington lies approximately 706 metres to the east of the site, with intervening agricultural land, vegetation and built form providing separation. Upper Arncott is circa 1.6 kilometres to the west of the site. Location maps, site constraint maps and environmental designation maps are at **Annex B, Figures 1–5**.

3.3. The B4011 provides connections north towards Bicester and south towards Thame. The nearest residential receptor is an isolated property, 'Wild Meadow', located circa 296 metres north of the site. HMP Bullingdon is circa 307 metres south-west of the site. HMP Bullingdon lies within a 21-hectare site and accommodates between 865 and 1,114 category B/C male inmates.

3.4. The site lies within the Impact Zone of the Arncott Bridge Meadows Site of Special Scientific Interest ("SSSI"). This SSSI is approximately 1.85 kilometres to the north-west. Other SSSIs within the wider area include Muswell Hill SSSI (approximately 2.5 kilometres to the south-east), Long Herdon Meadow SSSI (approximately 2.6 kilometres to the south-east), Rusbeds Wood and Railway Cutting SSSI (approximately 2.9 kilometres to the south-east), and Whitecross Green and Oriel Wood SSSI (approximately 3.9 kilometres from the site). Ecological designations and a SSSI Impact Zone are shown in **Annex B, Figure 10.**

3.5. The River Ray lies approximately 500 metres north of the application site. Cherwell District Council has proposed a Local Landscape Designation in its emerging local plan to protect areas of locally valued scenic quality. The proposed designation (which carries little weight at present) lies approximately 800 metres south of the application site. It includes land around the north-facing slopes of Muswell Hill, which forms part of the wider landscape context considered in the Landscape and Visual Impact section. Water environment features and nearby landscape designations are shown in **Annex B, Figure 11. Figure 12** shows the wider environmental context.

3.6. There are no conservation areas within 2 kilometres of the site boundary. There are 24 Grade II listed buildings and one Grade II* listed building within 2 kilometres of the site. Location maps, site context maps and environmental designation maps are at **Annex B.**

Physical Characteristics

3.7. Military infrastructure on the site includes warehouse buildings, hardstanding, service roads and railway infrastructure associated with the Bicester Military Railway. Extensive

areas of ridge-and-furrow survive within undeveloped parts of the wider site and provide evidence of the site's pre-war agricultural use.

3.8. Several of the former stores and warehouse structures have been subject to an Asbestos Demolition Survey. That survey confirms that asbestos-containing materials are present within parts of the existing building stock and external elements, principally associated with older electrical components, bitumen felt above link corridors, and cement strips to skylight windows. These findings are relevant to demolition, site preparation and construction management, rather than to the acceptability of the proposed use in principle. Existing buildings within the application site are shown in **Annex B, Figure 9.**

3.9. The site is surrounded by perimeter security fencing and is enclosed to varying degrees by existing vegetation and retained military development, with the strongest visual containment occurring along the southern and eastern boundaries and more open characteristics along the northern and western edges adjoining the B4011. Annotated site photographs showing the accesses, boundaries, vegetation and surrounding context are found at **Annex B, Figure 31**.

3.10. Consideration of the site’s levels, drainage, hardstanding, ground conditions, heritage features, trees and landscape context is set out in the relevant topic sections below.

4. PLANNING HISTORY

4.1. On 18 August 2003, the SSHCLG granted planning permission for the demolition of existing buildings and the erection of a Home Office immigration accommodation centre utilising the existing highway access (LPA Ref: 02/01045/GD; PINS Ref: APP/C3105/V/02/1097456). That permission related to accommodation for 750 asylum seekers, together with community, catering, administrative, welfare, hearing, sports, parking, landscaped and habitat areas.

4.2. On 21 December 2004, the SSHCLG granted planning permission for enabling works, including demolition of the existing gatehouse and search building, erection of a new gatehouse, extension of the perimeter fence and construction of two lay-bys. Reserved matters details were subsequently consulted on, but a final determination of the reserved matters was not reached.

4.3. This planning history is a material consideration because it demonstrates that the site has previously been found suitable in principle for immigration accommodation. Even so, the current proposal must be assessed on its own merits, including its materially different scale, operational model, ecological, drainage, transport and equality considerations.

5. PROCEDURAL MATTERS

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5.1. A site visit was undertaken on 19 May 2026 by officials from MHCLG, accompanied by Home Office officials. The site visit note is at **Annex C**.

5.2. Cherwell District Council, as the local planning authority ("LPA"), was notified of the application on 20 July 2026. The application was published on the MHCLG website on 03 September 2026, and a consultation and public representation period[1] ran from 07 to 17 September 2026. The LPA's comments, together with responses from statutory consultees and the public representations received, have been considered by officials and material considerations arising from them relevant to SSHCLG's determination are set out in this report.

5.3. On 28 October 2026, the HO requested consideration of a height for the proposed modular accommodation of up to 6.6 metres above finished ground level, rather than the 6 metres stated in their original application submission. On 5 November 2026, the HO provided further information about the likely height of the modular accommodation, being potentially 7 metres and rising to 8.5 metres above finished ground level. On 6 November 2026, the HO clarified that the proposed modular accommodation would not exceed 7 metres above finished ground level. The recommendation in this report is confined to that 7-metre maximum and does not include flexibility to approve taller modular accommodation buildings under condition 4.

5.4. Officials have considered whether the change in proposed heights requires a further opportunity for consultees and the public to comment, having regard to representations concerning building height, landscape and visual effects, and the adequacy of the environmental assessment. For the reasons set out in section 10, officials consider that an additional 1 metre would not materially alter the assessed landscape and visual effects. The recommended conditions would limit the modular accommodation buildings to two storeys and 7 metres above finished ground level, with coordinated controls over ground, floor and roof levels. On that basis, officials consider that the change in height would be very unlikely to have materially affected the substance of the representations made.

Environmental Impact Assessment and Habitats Regulations

5.6. An Environmental Impact Assessment Screening Direction was issued on 26 August 2026, concluding that the proposal was not EIA development and that an Environmental Statement was not required. Officials have reviewed all information received since the Screening Direction of 26 August, including the further ecological information and the HO's email of 5 November 2026 clarifying that the modular accommodation buildings could be 8.5 metres above finished ground level.

5.7. Officials have considered this clarification alongside the submitted environmental evidence and their own site-specific assessment, rather than relying on the technical conclusion reported by the HO. Having regard to the scale of the increase in modular building height, the site context and relevant sensitive receptors, officials consider that any additional effects arising from a height of up to 8.5 metres above finished ground level would be negligible in EIA terms, would not alter the conclusion on likely significant environmental effects and that the proposal is not EIA development.

5.9. Officials undertook a Stage 1 screening assessment for the purposes of the Habitats Regulations (informed by the submitted Habitats Regulations Assessment Screening, Preliminary Ecological Appraisal and supporting environmental information) to determine whether the project was likely to have a significant effect on any protected site, either alone or in combination with other plans or projects. Officials considered the relevant legal requirements under the Habitats Regulations, the methodology used by the applicant, the proposed zone of influence, and the potential impact pathways that could arise. These included direct habitat loss, loss of functionally linked land, recreational disturbance, airborne pollution, hydrological effects, disturbance to qualifying species, invasive species and changes to predator-prey dynamics.

5.10. Officials also considered the advice provided by Natural England and assessed whether sufficient information had been provided to enable the competent authority to reach a conclusion. Officials' Stage 1 screening identified potential effects associated with groundwater pollution, changes to water levels or flows and foul-water discharge. As the avoidance or mitigation measures relevant to those pathways could not lawfully be considered at the screening stage, likely significant effects could not be excluded. Officials undertook, therefore, a Stage 2 Appropriate Assessment. Officials concluded that, subject to the identified mitigation being secured through planning conditions, the proposal would not adversely affect the integrity of any protected habitat site, either alone or in combination with other plans or projects. The planning conditions necessary to avoid an adverse effect on integrity have been included in Annex K.

5.11. This conclusion relates to internationally protected habitat sites for the purposes of the Habitats Regulations. Natural England's separate concern regarding foul drainage is addressed in the Flooding and Drainage section and by the recommended foul-drainage condition.

Public Sector Equality Duty and Human Rights

5.12. In accordance with section 149 of the Equality Act 2010, officials have had due regard to the Public Sector Equality Duty ("PSED"). The application is supported by an Equality Impact Assessment prepared by the Home Office. A separate PSED assessment has been undertaken by officials and is included at **Annex D**. It considers the equality implications of the granting or refusing planning permission for the proposed development,

including effects on future occupants and neighbouring communities. The proposed operational model is relevant insofar as it informs the land-use effects of the development and the mitigation secured through the recommended conditions, particularly condition 17. The description of development does not restrict occupation to the Home Office's intended occupancy profile. Relevant matters include the intended occupation by single adult male asylum seekers aged 18 to 65, safeguarding, reasonable adjustments, relocation arrangements, onsite welfare and healthcare provision, stakeholder engagement and community cohesion measures. The equality implications are considered procedurally in this section and substantively in the Safeguarding and Community Cohesion section below.

5.13. Officials have also had regard to human rights considerations under the Human Rights Act 1998, including the rights of future site occupants, neighbouring residents and other affected persons. In officials' judgement, the proposal would interfere with private interests only to the extent identified in the topic-based assessment sections of this report. Subject to the mitigation and conditions recommended, officials consider that any interference would be proportionate and justified in the public interest, having regard to the urgent national need for asylum accommodation and the identified safeguards.

6. CONSULTATION RESPONSES

Statutory Consultee Responses

6.1. Statutory consultees' views were sought. Their responses are summarised below:

Natural England has no objection, subject to conditions. Its remaining concern relates to the long-term foul-drainage arrangements, which are addressed by the recommended foul-drainage condition.

Environment Agency has no objection, subject to conditions. Concerns were expressed regarding the quality and suitability of the submitted flood-risk evidence and the need to verify flood-risk data, watercourse connectivity and any necessary modelling. It also advises that connecting to the mains sewer would be the quickest, simplest and best environmental foul-drainage option.

National Highways has no objection. The predicted additional traffic on the B4011 is not expected to materially affect the Strategic Road Network, including M40 Junction 9.

Coal Authority has no objection. The site is not within an area of past coal mining activity.

Historic England has no comments.

Oxfordshire County Council as Local Highway Authority objects**.** It concludes that insufficient information has been provided to demonstrate safe and suitable access. Its concerns relate to the proposed access arrangements, visibility, pedestrian and cycle connectivity, and traffic distribution. It requests further assessment, together with Section 106 and Section 278 mitigation and planning conditions, if permission is granted.

Oxfordshire County Council as Lead Local Flood Authority ("LLFA") has a holding objection on the grounds of insufficient evidence to demonstrate that the site can be developed safely without increasing flood risk. Further investigation and modelling are required before the application can be supported.

Health and Safety Executive has no objection. The site is not in the consultation zones of any sites with hazardous substances consent or major accident hazard pipelines.

The full statutory consultee consultation responses are included at **Annex E.**

6.2. Local Authority and Parish Council Representations

Cherwell District Council objects and makes the following points:

- Significant information gaps on the development description, infrastructure capacity, environmental effects, operational arrangements, community impacts, economic/strategic growth impacts and supporting technical evidence.
- Requests a comprehensive package of further information and a further period of public consultation before determination.
- If permission is granted, asks to be consulted on any conditions and obligations.
- Seeks conditions covering site management, community liaison, equality and safeguarding, transport, drainage, ecology, landscape, lighting, contamination, PFAS, Unexploded Ordnance ("UXO"), asbestos, fire safety, noise, air quality, odour, energy, waste, archaeology, monitoring and reporting.
- Advises that the Human Rights Act 1998 and PSED should be fully considered, including impacts on neighbouring communities and future occupants.
- Raises concern that the EIA screening direction may need to be reviewed, as the submitted application documents may not align with the assumptions on which the screening opinion was based.
- Subject to the landscape and visual assumptions and mitigation measures in the submitted Landscape and Visual Statement being secured, the proposals are unlikely to result in significant adverse landscape or visual effects.

Piddington Parish Council (PPC) objects and makes the following points:

- The statutory urgency test has not been adequately justified, and the application should have followed the non-urgent Crown development process.

- Substantive flood-risk concerns, particularly in relation to Phase 1, where flooding was reportedly observed on a dry day and drainage is said to be non-operational. Insufficient modelling and no adequate evacuation plan have been provided.
- Insufficient information has been submitted to demonstrate the site's suitability or the feasibility of the development.
- Concerns regarding utilities capacity, hazardous waste, land contamination and compliance with relevant environmental legislation.

Bicester Town Council objects and makes the following points:

- The proposal would result in a significant change to the scale and character of the settlement and surrounding area, with consequential impacts on the existing community and local infrastructure especially local Healthcare and Public Services.
- Significant information gaps on ecology, contamination, flood risk, transport impacts, utilities infrastructure, wastewater disposal, fire safety and arrangements for Emergency Services and Access.
- Concerns are raised regarding the accuracy of environmental information and the potential effects on protected species and the adjacent SSSI.
- The use of the Urgent Crown Development process limits the scope for public scrutiny and consultation.
- Eleven days' consultation does not give residents, councils or technical specialists a fair opportunity to examine an application of this scale and complexity.
- Absence of pavements, pedestrian infrastructure and street lighting.
- Insufficient information has been submitted to demonstrate the site's suitability or the feasibility of the development.

Buckinghamshire Council objects. It considers that the statutory urgency test has not been justified. It also considers that the Environmental Impact Assessment Screening has been undertaken based on inaccurate information and insufficient pre-application engagement. It objects on socio-economic impacts, transport/highway safety, insufficient evidence, impact on local services, impact on existing local housing, cumulative impact on surrounding communities and safety.

Fencott and Murcott Parish Council objects on grounds of transport/highway safety, asbestos on site, drainage, lack of energy infrastructure and impact to local utilities.

Oakley Parish Council objects, suggesting that it is unlawful to provide insufficient evidence to members of the public. It objects on grounds of lack of sustainability of the site, flood risk, lack of sequential test, fear of crime, ground contamination and air quality.

Horton-cum-Studley Parish Council objects primarily on grounds of insufficient information and concerns about community impacts, transport/highway safety and environmental matters.

Ambrosden Parish Council objects. Considers that insufficient evidence has been provided, with too much reliance on later surveys, investigations and detailed design. It objects on highway, sustainable transport, infrastructure, drainage, ecology, amenity and rural-environment grounds. However, if permission is granted, it asks for the outstanding technical matters, mitigation and infrastructure requirements to be secured through planning conditions and monitoring arrangements before commencement and occupation.

Arncott Parish Council objects, stating the site is unsuitable and that the Urgent Crown Development route bypasses normal scrutiny. Its key concerns are local safety, policing, pressure on services, environmental impacts, property values and residents' wellbeing.

Blackthorn Parish Council objects on grounds of scale, location, design, local infrastructure, noise and environmental pollution, ground and water contamination, insufficient evidence, cumulative impacts on surrounding communities, highway safety and conflict with policies within the National Planning Policy Framework ("NPPF").

Ludgershall Parish Council objects and raises concerns regarding the site's accessibility and proposed transport arrangements, including pedestrian connectivity, access to public transport and the proposed use of the northern access for operational vehicle movements.

The full local authority and parish council representations are included at **Annex F.**

6.3. Representations from Critical Infrastructure Providers

Police & Crime Commissioner for Thames Valley objects**.** Insufficient consideration has been given to the implications of accommodating a large population in a relatively self-contained and isolated location with limited access to services and amenities. Such circumstances may increase the risk of social isolation, increase the risk of crime, increase demands on policing, place pressure on local infrastructure, and contribute to tensions within both resident and surrounding communities.

Thames Valley Police have no objection but advise that, due to the limited detail submitted, a full Designing Out Crime assessment cannot be undertaken at this stage. They recommend that the applicant give further consideration to the suitability of the site, having regard to its limited supporting infrastructure and reliance on organised transport; take steps to minimise the visibility of occupants and activities from outside the site in the interests of privacy, security and community safety; consider the potential for protest activity and associated policing requirements; consider community perceptions of safety and security, and the potential for significant additional, unbudgeted policing costs.

Thames Water has no objection but advises that insufficient information has been provided to assess the impacts on foul and surface water networks. It recommends a detailed drainage strategy confirming discharge points and methods, consideration of groundwater infiltration risks, and further assessment of water supply and foul network capacity. Initial investigations indicate that upgrades to foul water and water supply infrastructure may be required.

NHS Thames Valley Integrated Care Board objects unless mitigation is secured. It advises that local GP practices have no capacity to accommodate additional patients arising from the development and considers a contribution necessary to mitigate the development's impact. It is further noted that asylum seekers are entitled to register with NHS GP practices and that Urgent Crown Development proposals are not exempt from developer contributions where the statutory tests for planning obligations are met.

The full representations from critical infrastructure providers are included at **Annex G.**

6.4. MP Representations

Calum Miller MP (Lib Dem - Bicester and Woodstock) objects. He feels that the proposal is not genuinely urgent and should instead be considered through the ordinary Crown Development process to allow greater public participation. He also raises concerns that delays and uncertainty around the MOD Bicester proposal are causing financial harm to local residents, including failed property transactions, and seeks urgent publication of the application, clarity on the timetable and information on support for affected residents.

Greg Smith MP (Cons - Mid Buckinghamshire) objects. Requests that the application be refused, citing concerns that the site is unsustainable, transport and infrastructure arrangements are inadequate, environmental and community impacts have not been properly addressed, and the development would represent poor value for money. His concerns include limited accessibility and pedestrian safety, the scale of accommodation and potential community tensions, utilities, telecommunications and drainage capacity, limited technical information, ecological impacts including protected species and the River Ray, and funding arrangements.

Sarah Pochin MP (Reform - Runcorn and Helsby) objects. She states that insufficient information has been provided and that concerns remain regarding the site's location, accessibility, highways, ecology and infrastructure capacity, such that planning permission should not be granted.

The full representations from MPs are included at **Annex H.**

6.5. Other stakeholder representations

Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust objects:

- Potential hydrological impacts on nearby SSSIs, Local Wildlife Sites, nature reserves and priority habitats; the loss of existing habitat and ecological connectivity; adverse effects on landscape-scale nature recovery initiatives, including the Reconnecting Bernwood, Otmoor and Ray project, Upper Ray CTA and Local Nature Recovery Strategies; and increased recreational pressure on designated sites and priority habitats.
- Considers the site lies close to rare and species-rich MG4 floodplain meadow habitat and that the application does not provide sufficient assessment of the potential impacts on these habitats. It also considers the site has significant existing and future ecological value due to its location within and adjacent to ecological recovery areas, and that the development would undermine wider habitat creation and restoration objectives.
- Concludes that the proposal conflicts with Policy N6(1) of the NPPF. It further argues that MG4 floodplain meadow constitutes an irreplaceable habitat as defined by the NPPF and that the proposal should be refused under Policy N6(2). Should permission be granted, BBOWT requests long-term monitoring and mitigation measures to address any identified impacts.
- Raises concern that the consultation period was unreasonably short given the scale and potential environmental effects of the proposal.

Launton Youth Football Club objects**.** Concerns about traffic and pedestrian safety, parking and access, construction impacts, security and use of their pitches, and requests conditions and mitigation if the development proceeds.

Bicester Bike Users Group objects on transport grounds, due to the absence of safe and suitable pedestrian/cycle connections to the site, deficiencies in existing routes and the proposed junction, and concerns that the applicant has overstated cycling accessibility.

Langford Village Community Association Bicester objects, stating that unresolved concerns about utilities, asbestos, water supply, fire safety, ecology, contamination, flooding, transport, isolation, heritage, cost and deliverability mean the site is unsuitable for development at this scale.

Bicester Methodist Church objects on grounds of on-site suitability/safety, infrastructure, transport, environmental matters and the adequacy of the consultation period.

NatureSpace Partnership do not object in principle, subject to further information or appropriate licensing arrangements being secured in relation to great crested newts.

The other stakeholder representations are included at **Annex I.**

7. PUBLIC REPRESENTATIONS

7.1. Circa 3,177 public representations objecting to the proposal have been received. 1 representation supported the application. The principal concerns are in relation to:

- Use of the Urgent Crown Development procedure; consultation and representation arrangements; and the completeness, accuracy and transparency of the supporting evidence.
- Scale of the development; suitability of the rural location; effects on Piddington and neighbouring settlements; and the planning history of the site.
- Pressure on local infrastructure, utilities, healthcare, emergency services and other public services.
- Highway, pedestrian and cycle safety; public transport; and the site's accessibility.
- Flood risk, surface-water drainage, foul drainage and wastewater; ground contamination, asbestos and the site's former military use; and fire and emergency planning.
- Ecology protected species and other environmental effects; heritage, archaeology, landscape, noise, lighting and air quality; and cumulative impacts.
- Community safety, safeguarding, policing, site security and community cohesion; and the welfare and wellbeing of prospective occupants.
- The proposed ten-year duration and decommissioning arrangements; property values and local economic effects; value for money and alternative sites; and whether outstanding technical assessments should be completed and made available for scrutiny before determination.

The representation in support of the application highlighted the potential for asylum seekers to contribute positively to the community with appropriate community support and funding.

7.2. Officials have taken all representations into account. The principal matters raised (and where they are primarily addressed in this report, set out in bold below) concerned the use of the Urgent Crown Development procedure and the adequacy of the consultation and representation arrangements (**paragraphs 1.1–1.4 and 5.2**); the completeness, accuracy and transparency of the supporting evidence, including whether outstanding technical assessments should be completed and made available for scrutiny before determination (**paragraphs 2.6–2.7, 5.3–5.6 and the relevant topic-based assessments below**); the scale of the development and suitability of the rural location (**paragraphs 2.1–2.7, 9.3–9.12, 10.1–10.7 and 21.1–21.3**); and the potential for unacceptable pressure on local infrastructure, utilities, healthcare, emergency services and other public services (**paragraphs 13.1–13.7 and 22.1–22.5**). Concerns regarding highway, pedestrian and cycle safety and public transport are addressed at **paragraphs 11.1–11.21**; flood risk, surface-water drainage, foul drainage and wastewater at **paragraphs 14.1–14.6**; ground contamination, asbestos and the site's former military use at **paragraphs 3.1 and 3.7–3.10, and 15.1–15.4**; ecology, protected species and other environmental effects at

paragraphs 5.3–5.6, 16.1–19.5; community safety, safeguarding, policing, site security and community cohesion at **paragraphs 13.1–13.7**; effects on the character of Piddington and neighbouring settlements at **paragraphs 10.1–10.7 and 13.1–13.7**; and the planning history of the site at **paragraphs 4.1–4.3**. Further matters concerning the proposed ten-year duration and decommissioning arrangements are addressed at **paragraph 2.1 and the time-limit and reinstatement conditions in Annex K**; the welfare and wellbeing of prospective occupants at **paragraphs 5.8–5.9 and 13.1–13.7**; fire and emergency planning at **paragraphs 12.1–12.3**; heritage and archaeology at **paragraphs 20.1–20.5**; landscape, noise, lighting and air quality at **paragraphs 10.1–10.7, 17.1–17.5 and 18.1-18.5** together with the external lighting condition in Annex K; cumulative impacts at **paragraph 23.5**; and local economic effects, value for money and consideration of alternative sites, insofar as they are material planning considerations, in the assessment of need, site suitability and the overall planning balance at **paragraphs 9.3–9.12 and 23.1–23.5**. Property values are not a material planning consideration. The fact that a representation is not referred to individually does not mean that it has not been considered.

A summary of all public representations is at **Annex J**.

8. PLANNING POLICY CONTEXT

8.1. The statutory development plan for the site comprises:

- The Cherwell Local Plan (2011-2031) Part 1 (re-adopted in 2016) and Saved Policies of the Cherwell Local Plan (1996).

- Minerals and Waste Local Plan (adopted 12 September 2017 and prepared by Oxfordshire County Council).

8.2. Officials consider that the Local Plan policies relevant to the proposal are:

- Policy PSD 1: Presumption in Favour of Sustainable Development
- Policy BSC 2: The Effective and Efficient Use of Land – Brownfield and Housing Density
- Policy SLE 4: Improved Transport and Connections
- Policy BSC 9: Public Services and Utilities
- Policy ESD 1: Mitigating and Adapting to Climate Change
- Policy ESD 3: Sustainable Construction
- Policy ESD 6: Sustainable Flood Risk Management
- Policy ESD 7: Sustainable Drainage Systems (SuDS)
- Policy ESD 8: Water Resources
- Policy ESD 9: Protection of the Oxford Meadows SAC

- Policy ESD 10: Protection and Enhancement of Biodiversity and the Natural Environment
- Policy ESD 11: Conservation Target Areas
- Policy ESD 13: Local Landscape Protection and Enhancement
- Policy ESD 15: The Character of the Built and Historic Environment
- Policy ESD 17: Green Infrastructure

8.3. Relevant saved policies are:

- Policy TR7: Traffic on Minor Roads
- Policy TR10: Heavy Goods Vehicles on Minor Roads
- Policy C1: Nature Conservation
- Policy C2: Protected Species;
- Policy C4: Creation of New Habitats;
- Policy C7: Landscape Conservation;
- Policy C8: Sporadic Development in the Open Countryside;
- Policy C15: Prevention of Coalescence of Settlements;
- Policy C18: Historic Buildings;
- Policy C28: Layout, Design and External Appearance;
- Policy C32: Access for Disabled People;
- Policy ENV1: Environmental Pollution;
- Policy ENV10: Hazardous Installations; and
- Policy ENV12: Contaminated Land.

National Planning Policy

8.4. Relevant provisions of the NPPF are identified below. They are considered in the topic-based assessments and in the overall planning balance.

- DM3 Determining development proposals
- DM7 Relationship with other regulatory regimes
- S3 Presumption in favour of sustainable development
- S5 Principle of development outside settlements
- CC2: Mitigation of climate change
- L2: Making effective use of land
- DP3: Key principles for well-designed places
- DP4: The design process
- TR3: Sustainable transport and accessibility
- TR4: Street design, access and parking
- TR6: Assessing transport impacts
- P2 Ground conditions and pollution

- P3: Pollution and amenity
- P4: Impact of development on existing activities
- P5: Maintaining public safety and security
- P6: Land and operations for defence and public safety
- F4: Assessing flood risk for decision-making
- F7: Ensuring development is safe from flooding
- F8: Sustainable drainage systems and watercourses
- N3: Internationally protected habitat sites
- N6: Biodiversity and geodiversity
- HC3: Community facilities and public service infrastructure
- HE4: Securing the conservation of heritage assets
- HE5: Assessing effects on heritage assets
- HE6: Proposals affecting designated heritage assets
- HE7: Decisions on non-designated heritage assets.

8.5. Officials have also had regard to relevant Planning Practice Guidance, including that concerning the use of planning conditions, flood risk and coastal change, water supply and wastewater, land affected by contamination, noise, travel plans and transport assessments, and the natural environment.

9. DETERMINATION

9.1. The principal planning considerations are the need for the development; the principle of development and use of previously developed land; landscape and visual impact; access and transport; fire safety and emergency access; equality; safeguarding and community cohesion and public safety; flooding and drainage; ground conditions; contamination; asbestos and UXO; noise; ecology and biodiversity; archaeology and built heritage; impacts on local facilities and services. The consideration of these matters has been undertaken against the relevant policies of the development plan and other material considerations, including the NPPF and the Planning Practice Guidance, where applicable.

NEED FOR THE DEVELOPMENT

9.2. Demand for asylum accommodation remains high by historic standards and fluctuates materially over time, placing continuing pressure on the asylum accommodation estate. The Home Office evidence, particularly the Statement on National Importance, identifies a particular shortage of suitable single-occupancy provision: approximately 58% of beds are required to be single occupancy, whereas only 45% of the existing estate comprises single beds. Together with commercial constraints on expanding suitable dispersal accommodation, this results in continued reliance on hotels to meet the shortfall.

9.3. The identified shortage of suitable accommodation capacity increases the risk of destitution and places additional pressure on essential public services. Although hotels currently provide contingency capacity, they are generally less suitable for accommodation at scale or for extended periods and can create dispersed pressures on healthcare, safeguarding, policing, local authorities and host communities.

9.4. The asylum accommodation estate is managed nationally and must retain sufficient flexibility and contingency capacity to respond to changes in arrivals, occupancy, cohort mix and movement through the estate, in support of the SSHD's statutory asylum-support functions under the Immigration and Asylum Act 1999. The proposal would provide up to 1,256 places and would make a material contribution to addressing the identified and current shortage of suitable accommodation capacity and improving the national estate's operational resilience and contingency headroom.

9.5. The proposal would enable accommodation, welfare, healthcare and administrative services to be coordinated at a single controlled site. Its substantially self-contained operational model would assist the safe and effective management of the estate, although the site-specific implications for safeguarding, community cohesion, public safety and local services remain matters requiring separate assessment.

9.6. Officials give **substantial positive weight** to the urgent national public-service need for the development, having regard to the national scale of accommodation need, the identified current shortage of suitable accommodation capacity and operational headroom, the SSHD's statutory asylum-support functions, the operational evidence before officials and the proposal's contribution to estate resilience and contingency capacity. This need is a material consideration to which substantial weight is given when applying **Policy S5 of the NPPF** as set out below.

PRINCIPLE OF DEVELOPMENT

9.7. The site lies outside an existing settlement. Policy S5 of the NPPF is therefore applicable. Officials consider that the proposal falls within Policy S5(1)(d) (redevelopment of previously developed land) because it would redevelop part of a substantially underused former military storage and distribution site, with accommodation and associated facilities focused principally on existing hardstanding, retained buildings and other previously developed parts of the site. The proposal would also derive support from Policy L2 of the NPPF, by making better use of vacant and underutilised land and buildings. Policy S5(1) provides that the redevelopment of previously developed land outside settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF. The benefits and adverse effects are assessed in the topic-based sections below and considered together by applying Policy S5 in the "planning balance" in section 23.

9.8. Cherwell Local Plan Policy BSC 2 is considered to be relevant to determining whether there is support for the proposed development on this site in principle. Policy BSC 2 promotes the effective use of land and the reuse of previously developed land for "housing" development in sustainable locations. Although the proposal would not constitute Class C3 residential development, it would still provide managed residential accommodation for asylum-seekers and bring previously developed land back into beneficial use. Officials consider, therefore, that the general principle of the policy is met. The sustainability of the location is considered further below.

9.9. Officials consider that the effective reuse of previously developed land provides support for the principle of development on this site under national policy and the effective-land-use objective of Policy BSC 2. Whether permission should be granted depends on the site-specific effects, infrastructure requirements, operational controls and mitigation assessed below, together with the overall planning balance in section 23.

Abandonment of former use

9.10. Officials have considered whether the established military storage and distribution use of the site has been abandoned. Most of the buildings on site have remained vacant for a prolonged period and, along with other structures, are in poor condition, with parts of the site overgrown and several buildings requiring substantial remediation before reuse.

9.11. However, although most of the site is no longer in active use, use has not ceased across the whole site. The HO states that Plot 1 continues to be used predominantly for [redacted] subject to an existing lease and in active daily use, and that [redacted] continues within the site.

9.12. Having regard to the period of non-use, the condition of the land and buildings, intervening uses and the available evidence regarding continued activity, officials consider that the former military storage and distribution use has been substantially reduced but has not been abandoned across the application site as a whole. The appropriate baseline for assessment is, therefore, an extant but limited storage and military-related use.

10. LANDSCAPE AND VISUAL IMPACT

10.1. In its letter dated 28 October 2026, the HO clarified that modular buildings could result in double-stacked accommodation up to 6.6 metres above finished ground level. The HO reports that it obtained further technical advice indicating that this would not materially alter the assessed landscape and visual effects or require the Landscape and Visual Statement or associated Zone of Theoretical Visibility to be updated. On the 6 November 2026, the HO clarified that 7 metres above finished ground level is now proposed.

10.2. Officials have considered the additional 1 metre alongside the submitted landscape evidence and their own assessment of the site and relevant receptors. Their reasons for concluding that the change would not materially alter the assessed landscape and visual effects are set out in paragraphs 10.4–10.8. The existing Zone of Theoretical Visibility is based on a 6-metre building height and has not been treated as a model of the 7-metre proposal.

10.3. The application is supported by a Landscape and Visual Statement, including a Zone of Theoretical Visibility based on modular accommodation units of up to two storeys and a maximum height of 6 metres. The submitted Parameters Site Plan identifies an overall operational development height of 12 metres. The HO has confirmed that this parameter accommodates Building A6, the retained warehouse-type building, roof-mounted plant and the requirements of detailed construction methodologies; it does not provide for new 12-metre-high accommodation buildings. Officials have considered that evidence alongside their own assessment of the site context, surrounding landscape character and likely visual receptors. The Zone of Theoretical Visibility and principal viewpoints are shown in **Annex B, Figure 15**.

10.4. The site is not within a nationally designated landscape, and the development would be contained within an established former military estate. Officials consider that this context reduces the site's sensitivity to the proposed temporary modular accommodation, which would be viewed largely within an existing developed setting rather than as a standalone complex in the open countryside.

10.5. The clearest views are likely to be from passing vehicles on the B4011. Some development may also be visible from nearby rights of way, dispersed rural receptors and some settlement-edge locations, including the western edge of Piddington. Those effects would be moderated, however, by existing woodland, hedgerows, and other mature vegetation along the eastern, southern and western sides of the site, together with retained military development and intervening built form. Landscape receptors and proposed visual mitigation are shown in **Annex B, Figures 15 and 16**. Principal viewpoints are shown in **Figure 17**, and the site boundaries, vegetation and surrounding context are illustrated in **Figure 31**.

10.6. Cherwell Local Plan Policies ESD 13, ESD 15 and ESD 17 require development to respect local landscape character, integrate successfully with its surroundings and protect and enhance green infrastructure. The proposal would introduce accommodation buildings, infrastructure, lighting and security features into a rural-edge location. This would cause some localised change to landscape character and visual amenity, particularly from the B4011, nearby rights of way and parts of Piddington.

10.7. Even so, the existing site contains former military buildings and infrastructure, including Nissen Huts of approximately 3 metres in height and retained storage and distribution infrastructure buildings of approximately 6 metres in height immediately east and south of the application site. The proposal would largely occupy existing hardstanding and would be experienced principally in the context of the established military estate. Officials consider, therefore, that visual impact beyond the site would be limited, particularly having regard to the existing and proposed vegetation. Building A6 already forms part of the site's established built context.

10.8. Officials recognise that the additional 1 metre could increase the visibility of upper parts of the accommodation buildings in some views. However, having regard to the established military-development context, intervening built form and vegetation, and the receptor locations described above, officials consider that the increase would not materially alter their assessment of landscape character or visual effects. Any roof-mounted plant or other structure, other than the modular accommodation buildings themselves, extending above 6 metres above existing ground level would be controlled by condition as to its height, siting, scale, appearance and visual mitigation, within the overall maximum height of 12 metres above existing ground level. Controls would also be secured over layout, materials, lighting, vegetation retention and landscaping.

10.9. Subject to those controls, officials consider that the proposal, including modular accommodation buildings up to 7 metres above finished ground level, would accord overall with **Policies ESD 13, ESD 15 and ESD 17**. Although the development would cause limited and localised landscape and visual change, those effects would be adequately mitigated by the established former military context, existing and proposed vegetation, and the controls over height, layout, materials, lighting and landscaping. Officials therefore consider that there would be no material residual landscape or visual harm.

11. ACCESS & TRANSPORT

11.1. The application is supported by a Transport Assessment ("TA") and Travel Plan ("TP"). Officials have considered that evidence alongside National Highways' ("NH") no-objection response and Oxfordshire County Council's ("OCC") objection as local highway authority. NH raises no objection in relation to the Strategic Road Network. OCC's concerns relate to access design, visibility, pedestrian and cycle safety, traffic distribution, collision assessment scope and operational routing.

11.2. The site is accessed from the B4011. The highway assessment baseline comprises April 2026 traffic surveys of the surrounding network. Although limited storage and military-related activity continues within the application site, the Transport Assessment gives no credit for existing or historic site-generated movements and assesses the full forecast traffic associated with the proposal as additional to the surveyed highway baseline. The proposal would, therefore, represent a material intensification of movements to and from the site, notwithstanding that the submitted modelling indicates that the access and wider

network would remain within capacity. Site accesses and relationship with the B4011 are shown at **Annex B, Figure 30.**

11.3. The submitted capacity modelling principally assesses the northern site access and indicates that it would operate within capacity. The HO has subsequently confirmed that the southern access could serve as the principal operational access, with the northern access used for emergency or contingency purposes, although its preference is that both accesses should be available for operational use where they are demonstrated to be safe and suitable. National Highways raises no objection, and the proposal would not give rise to severe congestion or material impacts on the Strategic Road Network, including M40 Junction 9. Officials consider that capacity impacts on the B4011 and Strategic Road Network are acceptable in principle. However, the final allocation of movements between the accesses, and any associated effects on the local highway network, must be confirmed through the Highway Safety and Access Scheme. The outstanding matters relate to the detailed design and operation of existing accesses. There is no reason to consider that safe access is incapable of being delivered or that a materially different form of development would be required to do so.

11.4. The site has limited sustainable transport accessibility. Oxfordshire County Council assessed the site using the Department for Transport's Connectivity Tool, in accordance with **Policy TR3(2) of the NPPF**, obtaining a score of 17–19. This supports officials' assessment that the site has limited sustainable transport accessibility. It is relatively remote from day-to-day services, has limited pedestrian provision, including the absence of a continuous safe and well-lit footway, and does not provide a continuous safe pedestrian or cycle route from the site accesses along the B4011 to nearby services or public transport. Officials consider this results in partial conflict with the sustainable transport objectives of **Policy TR3 of the NPPF** and **Cherwell Local Plan Policy SLE 4**. This is because the application does not specify fixed routes or destinations for managed transport, although it indicates that this may provide access to Bicester or other nearby urban centres. However, consistent with **Policy TR3(1)(b) of the NPPF**, the routes, destinations, frequency and hours of operation would need to be confirmed through the operational transport arrangements. The conflict is substantially moderated, however, by the operational model: Service Users would not have access to private vehicles; day-to-day facilities would be provided on site; necessary off-site journeys would be undertaken by managed transport; and staff and visitor travel would be managed through the TP. Pedestrian, cycle and public-transport accessibility are shown at **Annex B, Figure 33.**

Highway Safety and Access

11.5. Officials consider that the northern and southern accesses are capable in principle of serving the development, subject to approval of a Highway Safety and Access Scheme applicable to the relevant works or use, defining their respective operational roles, detailed

design and management arrangements before the relevant construction works, commence, and completion of all works and measures necessary for each approved use before that use begins. The HO has confirmed that the southern access could serve as the principal operational access, with the northern access used for emergency or contingency purposes. The HO's preference is that the permission should retain flexibility for both accesses to be used operationally, subject to any necessary improvements being approved and implemented. The matters requiring control include access geometry, visibility, internal circulation, vehicle turning, gate management, servicing, emergency access, operational routing and the allocation of vehicle types and movements between the two accesses. These matters would be secured through the Highway Safety and Access Scheme required by the recommended conditions.

11.6. Officials note OCC's concerns regarding right-hand visibility and the scope of the collision assessment. The HO notes that the northern access is an existing estate access; modelling indicates substantial spare capacity and negligible queuing; the design provides a 17-metre gate setback; and the submitted information demonstrates that a 16.5-metre articulated vehicle can be accommodated. The available collision data also identifies no pattern of collisions at the access. Officials consider that the evidence demonstrates that safe access is achievable in principle and that the outstanding matters concern detailed refinement rather than a fundamental constraint requiring material redesign. The existing northern access and its relationship with the B4011 are illustrated in **Annex B, Figure 31.**

11.7. Officials note OCC's concern that HGVs and coaches approaching the northern access from the north may need to track into the opposing traffic lane. The southern access provides an alternative means of access and benefits from a widened entry lane to the north, a widened exit lane to the south, street lighting and a footway along this part of the B4011. The HO has confirmed that the southern access could serve as the principal operational access, thereby avoiding reliance on the northern access for routine operational movements. The northern access could be retained for emergency or contingency use or, if any necessary access and highway improvements are approved and implemented, could also accommodate those operational movements demonstrated to be safe and suitable through the Highway Safety and Access Scheme.

11.8. The recommended highway condition would require approval of the Highway Safety and Access Scheme applicable to the relevant works before those works commence. A separate scheme may cover only the specified early works, as explained at paragraph 11.18; the scheme for subsequent construction and operational use would identify the respective roles of the northern and southern accesses and the movements permitted through each access.The scheme would address staff and visitor vehicles, managed Service User transport, coaches, service and refuse vehicles, emergency vehicles and any other operational traffic. It would include revised access drawings, measured visibility splays, swept-path analysis for all relevant vehicle types, internal circulation and gate-

management arrangements, operational routing and details of any necessary access, highway or traffic-management works. The scheme would also establish whether the northern access is to be used solely for emergency and contingency purposes or for wider operational use. No access could be brought into its approved operational use until the works and controls necessary for that use had been implemented. OCC would be consulted on the scheme. Subject to those controls, officials consider that safe and suitable access is capable of being achieved and that the proposal would accord with **Policy TR4 of the NPPF** and **Cherwell Local Plan Policy SLE 4**.

Parking Provision

11.9. Officials consider that the proposed parking provision is proportionate to the operational needs of the development. The scheme would provide 139 standard car parking spaces and eight accessible spaces for staff and visitors only (as Service Users would not have access to personal vehicles).

11.10. The proposal would also provide cycle and powered two-wheeler parking, including provision for non-standard or mobility-impaired cycles, to include lockers, changing rooms and shower facilities for staff who cycle to work. Officials consider that these measures are appropriate in principle, but their effectiveness depends on the final Travel Plan, managed transport arrangements and operational controls being secured and implemented.

11.11. Subject to those controls, officials consider that parking would be contained within the site and would not give rise to parking stress or displacement impacts in the surrounding area. The proposal would therefore accord with **Policy TR4 of the NPPF** and **Cherwell Local Plan Policy SLE 4**.

Travel Plan, Targets and Monitoring

11.12. Officials consider that a proportionate final Travel Plan is necessary to manage staff and visitor travel. The submitted Travel Plan relies on 2011 Census journey-to-work data, which is not a measure of existing site-generated movements and does not provide a reliable baseline for the workforce likely to operate the site. Given the site's limited sustainable transport accessibility, the scope for significant modal shift is likely to be limited. Nevertheless, the Travel Plan could support car sharing, bus use and cycling where practicable, establish actual staff and visitor travel patterns through post-occupation surveys, and provide for proportionate targets and remedial measures to be reviewed against that evidence.

11.13. A condition should therefore require a corrected final Travel Plan before first occupation of the relevant phase, including the appointment of a Travel Plan Coordinator, implementation of staff travel information, cycle parking, lockers, changing and shower facilities, car-sharing promotion, baseline surveys within six months of first occupation,

repeated surveys at years 1, 3 and 5, monitoring reports, target review and remedial measures where targets are not met.

11.14. Service User travel should be secured separately through the Operational Management, Safeguarding and Community Cohesion Plan, as Service Users would not have access to private vehicles and necessary off-site journeys would be undertaken by shuttle bus, minibus, taxi or other arranged transport. The application does not specify fixed routes or destinations, although it indicates that managed transport may provide access to Bicester or other nearby urban centres. The plan should therefore confirm the routes and destinations to be served, together with the availability, capacity, frequency and hours of operation of managed transport, and arrangements for monitoring taxis, coaches, servicing, deliveries and other operational vehicle movements. These measures are necessary to mitigate the site's accessibility shortcomings and would support compliance with Policy TR6 of the NPPF but would only partially address the requirements of Policy TR3 of the NPPF and Cherwell Local Plan Policy SLE 4. The proposed managed transport and operational movement arrangements are shown at **Annex B, Figure 34.**

11.15. Subject to those controls, officials consider that the Travel Plan and managed transport arrangements would enable the proposal to accord with Policy TR6 of the NPPF but would only partially address the requirements of **Policy TR3 of the NPPF** and **Cherwell Local Plan Policy SLE 4**. They would moderate, rather than remove, the site's sustainable accessibility shortcomings.

Construction Traffic and Temporary Impacts

11.16. Separately from the operational assessment above, construction traffic has not yet been quantified in detail, as it will depend on the final programme, phasing, demolition requirements, contractor arrangements and modular installation methodology. Officials consider that this does not preclude permission, provided construction impacts are controlled through a Construction Traffic Management Plan ("CTMP").

11.17. The CTMP should secure construction routing, delivery scheduling, HGV management, measures to avoid peak-hour conflicts, wheel washing, highway cleaning, site compound arrangements, construction staff travel arrangements and monitoring of compliance. Subject to approval and implementation of that plan before relevant works commence, officials consider that construction traffic impacts would be temporary and capable of being adequately managed. Operational access, servicing, routing, managed transport and monitoring are assessed separately above and would be controlled through the Highway Safety and Access Scheme, Operational Management, Safeguarding and Community Cohesion Plan and Travel Plan.

11.18. The HO has identified a limited package of non-invasive drainage and utility surveys, and temporary site-establishment works. The recommended conditions allow

separate, proportionate submissions for specified early works, without authorising the main construction programme. Welfare and fencing deliveries, including articulated lorry and HIAB movements, would remain subject to approved traffic and access arrangements appropriate to their vehicle types and movements. Any access improvements or controls necessary for those movements would be implemented before they begin. Approval of early-works submissions would not discharge the requirements applicable to subsequent construction or operational use.

Access and Transport Conclusion

11.19. Officials consider that highway capacity and Strategic Road Network impacts are acceptable, having regard to National Highways' no-objection response and the submitted capacity modelling. Officials consider that the available evidence establishes that safe and suitable access is achievable in principle. In particular, the availability of the southern access as the principal operational access means that occupation would not depend on the northern access being demonstrated suitable for routine operational traffic. The outstanding matters concern the final allocation of movements between the two existing accesses, the detailed design and implementation of any necessary improvements and associated mitigation. The Highway Safety and Access Scheme applicable to the relevant works would be approved before those works commence, with the necessary works and controls implemented before each approved access use begins.

11.20. The recommended conditions require approval of the Highway Safety and Access Scheme applicable to the relevant works before those works commence and implementation of the works and controls necessary for each approved access use before that use begins. Separate conditions secure construction traffic management, managed Service User transport, a final Travel Plan and ongoing monitoring. Subject to those controls, officials consider that the development is capable of being made acceptable in access and transport terms. Each access would be used only for the operational roles demonstrated to be safe and suitable through the approved scheme.

11.21. The site's limited sustainable accessibility and the absence of continuous, safe and well-lit pedestrian and cycle routes connecting the site to local settlements would restrict travel by sustainable modes, increase reliance on motorised transport and create potential safety risks for pedestrians and cyclists. This would result in partial conflict with **Policy TR3 of the NPPF** and **Cherwell Local Plan Policy SLE 4.** In reaching a conclusion on this residual harm, officials have taken account of the substantially self-contained operational model, the absence of Service User car ownership, the provision of on-site facilities, Travel Plan measures and managed Service User transport, including the routes, destinations, capacity, frequency and hours of operation to be confirmed through the operational arrangements. After taking that mitigation into account, officials give the residual transport and accessibility harm **limited adverse weight**.

12. FIRE SAFETY AND EMERGENCY ACCESS

12.1. The application is supported by a RIBA Stage 2 Fire Safety Strategy. Detailed fire-safety matters, including firefighting facilities, evacuation arrangements and operational fire procedures, will be addressed through Building Regulations and, where applicable, the Regulatory Reform (Fire Safety) Order 2005. Officials have, therefore, considered only the site-specific planning matters, principally emergency access through the secure perimeter and coordination with the approved site layout and access arrangements. The proposed layout and emergency-access arrangements are shown in **Annex B, Figures 6–8.**

12.2. Officials consider that the submitted strategy does not identify any fire-safety or emergency-access matter that would preclude planning permission. Site-specific controls are nevertheless required to ensure that emergency vehicles can pass through the secure perimeter and access the development in accordance with the approved site layout and access arrangements. These matters would be secured through the Emergency Access Strategy required by condition, coordinated with the Highway Safety and Access Scheme and the Operational Management, Safeguarding and Community Cohesion Plan.

12.3. Subject to those site-specific controls, officials consider that the proposal would accord with **Policies P5 and TR4 of the NPPF** and **Cherwell Local Plan Policies SLE 4 and ESD 15** in respect of emergency access. Fire safety is otherwise addressed through the relevant regulatory regimes.

13. EQUALITY, SAFEGUARDING, COMMUNITY COHESION AND PUBLIC SAFETY

13.1. The application is supported by an Equality Impact Assessment (“EQIA”). Officials have considered the EQIA insofar as it informs the land-use implications of the proposal, including the suitability and accessibility of the site and accommodation, effects on local services, public safety and community cohesion, and the mitigation required to make the development acceptable in planning terms.

13.2. The proposed occupancy model is principally an operational and equality-law matter for the Home Office. Its relevance to the planning assessment is limited to its implications for site accessibility, accommodation and welfare infrastructure, local services, neighbouring communities and the need for reasonable adjustments within the physical development.

13.3. The principal planning effects arise from the scale and location of the development, its limited independent accessibility, potential pressure on local services and policing, and possible effects on public safety and community cohesion. These matters require mitigation through suitable on-site facilities, inclusive design, managed transport, security measures, stakeholder liaison and arrangements for monitoring and responding to off-site impacts. The relationship between the site, surrounding settlements and nearby sensitive receptors is shown in **Annex B, Figures 1–5**.

13.4. The site's defined boundaries, perimeter fencing with controlled access and capacity to accommodate coordinated on-site facilities would assist in mitigating these effects. Officials treat these measures as necessary mitigation, rather than a separate planning benefit. The proposed site boundaries, controlled access and arrangement of on-site facilities are shown in **Annex B, Figures 6–8.**

13.5. Officials have considered the suitability and allocation process, individual needs, reasonable adjustments, healthcare and welfare provision, managed transport, safeguarding and relocation arrangements. Officials have also considered effects on neighbouring communities, including concerns about the safety of women and girls, perceptions of safety, community cohesion, policing demand and protest activity. The site would be closely managed through 24-hour staffing, controlled access, CCTV, security patrols and incident-response procedures. Service Users would be free to enter and leave, but the site's relatively isolated location and limited pedestrian connections are likely to constrain journeys on foot. While these measures cannot eliminate all risk, officials consider that they would materially reduce security and community-safety risks. The measures would be secured through the proposed on-site facilities and the Operational Management, Safeguarding and Community Cohesion Plan.

13.6. Subject to a condition requiring approval and implementation of an Operational Management, Safeguarding and Community Cohesion Plan before occupation of each relevant phase, officials consider that the material planning effects on public safety, community cohesion, accessibility and local services can be adequately mitigated.

13.7. The proposed operational controls would materially reduce the identified risks. Subject to those controls, officials consider that the proposal would accord with **Policy P5 and Policies DP3, DP4, TR4 and TR6 of the NPPF**, where relevant to safe and inclusive site operation and managed movement, and with **Cherwell Local Plan Policies BSC 9** and **ESD 15. It would remain in partial conflict with policy SLE 4 because of the site's limited independent accessibility**. However, having regard to the scale and location of the development and its residual implications for community interaction and perceptions of safety, officials give the residual effects on community cohesion **limited adverse weight**. Transport and accessibility harm is weighed separately in section 11, and residual demand on policing and other local services is weighed in section 22; those effects are not counted again here.

14. FLOODING AND DRAINAGE

14.1. The application is supported by a Flood Risk Assessment ("FRA") and Drainage Design Statement. Officials have considered these alongside the Environment Agency's ("EA") comments and the LLFA holding objection.

14.2. The site is predominantly within Flood Zone 1, with higher-risk fluvial areas limited to

boundary locations associated with the River Ray and an unnamed tributary. Officials note the EA's view that the submitted FRA does not fully assess the quality or suitability of the available flood risk data, and that there is uncertainty in the mapped Flood Zone information in this location. However, the EA has undertaken a light-touch review against local knowledge and the best available information and considers that, subject to confirmation that the on-site watercourses are not directly connected to the wider river network, the practical risk of fluvial flooding at the site is very low. Officials consider, therefore, that fluvial flood risk does not preclude development, and that the sequential and exception tests are not required in respect of fluvial risk. Conditions will be needed to secure the final drainage and flood risk strategy to verify watercourse connectivity, levels, outfalls and any necessary modelling. The site's relationship with the River Ray, nearby watercourses and mapped environmental constraints is shown in **Annex B, Figures 10–12. Figure 21** shows the Fluvial flood zones and nearby watercourses and **Figure 22** the River Ray, tributaries and potential watercourse connectivity.

14.3. Surface water flooding is the principal flood risk. The submitted evidence identifies medium surface water flood risk in present-day and future climate change scenarios, with areas of mapped risk across parts of the site. Officials consider that this risk is capable of being managed, provided that the final layout, finished levels, exceedance routes, drainage asset condition, outfalls, discharge rates, water-quality treatment and maintenance arrangements are approved before development commences within the relevant phase, except for specified early works undertaken in accordance with separately approved drainage and flood risk safeguards, and the necessary infrastructure and mitigation required by the approved strategy are implemented before occupation. **Annex B Figure 25** shows the existing surface-water flood risk and **Figure 26** the surface-water flood risk including climate-change allowances and attenuation arrangements.

14.4. The HO's preferred foul-drainage solution is connection to the municipal wastewater network. Officials agree with the EA that this would be the quickest, simplest and best environmental option subject to confirmation of capacity, connection points, phasing and any necessary upgrades. Pending connection, the HO proposes temporary cesspool storage with removal by tanker to a receiving treatment works. This would provide an interim arrangement only, rather than a long-term solution at full occupancy. Its acceptability depends on adequate storage and receiving treatment capacity, reliable collection arrangements and acceptable traffic, noise, odour, pollution and ecological effects. The recommended foul-drainage condition therefore requires approval and implementation of a phase-specific foul-drainage strategy before occupation, including these safeguards, emergency contingency arrangements, monitoring, maximum occupancy and duration limits for interim tankering, and a timetable for transition to the network connection. Occupation should remain within the capacity of the approved arrangements. Any alternative on-site treatment or discharge-to-watercourse solution would require separate justification and assessment, including treatment performance,

sludge management, operational resilience, ecological effects and any necessary environmental permit. Reliance on the condition requires sufficient evidence before determination that an acceptable solution is feasible; it should not defer resolution of a fundamental drainage constraint.

14.5. In applying Policy F7 of the NPPF, officials have considered whether the development would be safe from flooding for its lifetime, would avoid increasing flood risk elsewhere, would incorporate appropriate flood-resistance and resilience measures, and would provide safe access, escape and exceedance arrangements, taking account of climate change. The site is predominantly within Flood Zone 1, and the EA considers the practical fluvial risk to be very low, subject to verification of watercourse connectivity. Surface-water risk remains the principal source of flooding. The recommended surface-water drainage condition requires verification of flood-risk data and drainage assets, hydraulic modelling for the 1-in-100-year event with an appropriate climate-change allowance, appropriate finished floor levels, exceedance routing, attenuation, discharge controls, water-quality treatment and implementation before occupation. Subject to those requirements, officials consider that the development would be safe for its lifetime and would not increase flood risk elsewhere. The separate requirements for foul drainage, interim cesspool storage and tankering, are addressed at paragraph 14.4 and secured through the recommended foul-drainage condition.

Flooding and Drainage Conclusion

14.6. The available evidence establishes that an acceptable surface-water and foul-drainage solution is achievable in principle. Condition 8 requires approval of the detailed surface-water strategy before development within each phase, except for specified early works subject to separately approved drainage and flood risk safeguards. Condition 9 requires implementation of the surface water drainage infrastructure and flood risk mitigation before occupation. Condition 10 requires approval and implementation of the foul drainage strategy before occupation and subsequent operation in accordance with the approved arrangements. Separate provision is made for temporary daytime use of contractor welfare facilities, subject to approved drainage and wastewater safeguards. Subject to those conditions, including the safeguards applicable to specified early works and temporary contractor welfare facilities, officials consider that the proposal would be safe from flooding for its lifetime, avoid increasing flood risk elsewhere, incorporate appropriate sustainable drainage and protect water resources and water quality. The proposal would, therefore, accord with **Policies F4, F7 and F8 of the NPPF** and **Cherwell Local Plan Policies ESD 6, ESD 7 and ESD 8**. Officials consider that the identified flooding and drainage impacts would be adequately addressed and afford this matter **no adverse weight** in the planning balance.

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15. GROUND CONDITIONS, LAND CONTAMINATION, ASBESTOS AND UNEXPLODED ORDNANCE.

15.1. The application is supported by ground conditions, geo-environmental, asbestos and UXO evidence, given the site's former military storage and distribution use. These matters are relevant to **Policy P2 of the NPPF**, which requires sites to be suitable for their proposed use taking account of ground conditions, contamination, land stability, pollution and risks to health. They are also relevant to **Cherwell Local Plan Policies ESD 8 and ESD 15,** and **Saved Policy ENV12**, insofar as the proposal may affect water quality, controlled waters, environmental protection, site suitability and the safe integration of development into its context.

15.2. Ground conditions, contamination, asbestos and UXO are known constraints, but do not preclude development. The submitted evidence identifies potential localised contamination associated with Made Ground, former burning grounds, vehicle storage and maintenance areas, railway sidings, historical tanks and electrical infrastructure. It also identifies asbestos-containing materials within parts of the existing building stock and external elements, a medium geotechnical risk from differential settlement beneath existing hardstanding, and a low but identifiable UXO risk.

15.3. Having regard to all the information submitted, officials consider that the identified ground, contamination and asbestos risks can be managed through investigation, remediation and appropriate construction controls secured through suitably worded conditions. The UXO risk is low given the extensive hardstanding, previous disturbance and continued use of parts of the site, and any residual risk can be managed through standard mitigation. Measures will also be required to prevent contaminants reaching controlled waters, drainage features, the Secondary Aquifer or sensitive ecological receptors. Conditions 11–15 would secure phase-specific contamination assessment, any necessary remediation and verification, while Condition 16 would secure UXO risk mitigation. Condition 6 would secure asbestos-management measures before demolition or other works capable of disturbing asbestos-containing materials, together with arrangements for confirming completion before affected areas are brought into use.

15.4. Subject to those safeguards, officials consider that the site can be made suitable for the proposed accommodation use and that risks to human health, construction workers, future occupants, controlled waters, drainage features, the environment and sensitive ecological receptors can be adequately mitigated. The proposal would accord with **Policy P2 of the NPPF**, **Cherwell Local Plan Policies ESD 8 and ESD 15**, and **Saved Policy ENV12**. These known constraints are capable of being investigated and remediated through established measures, and the recommended conditions would prevent relevant works or occupation unless those measures are completed.

16. TREES / ARBORICULTURE

Existing Arboricultural Value

16.1. The application is supported by a Tree Survey ("TS") and Tree Constraints Plan ("TCP"). None of the trees on or adjacent to the site are subject to statutory or non-statutory designations: there are no Tree Preservation Orders ("TPO") affecting the site, the site is not within a Conservation Area ("CA"), and no ancient woodland or ancient, veteran or notable trees have been identified within the survey area. Tree constraints, root-protection areas and proposed tree retention and removal are shown in **Annex B, Figure 29.**

16.2. Any tree loss is expected to be limited principally to lower-quality Category C or Category U trees, with higher-quality trees retained where practicable. Officials therefore consider that tree loss would not be significant, subject to tree protection and to any necessary replacement planting being secured by condition.

16.3. Officials conclude that the proposal would accord with **Cherwell Local Plan Policies ESD 10, ESD 13 and ESD 17**, insofar as they require trees, biodiversity, landscape character and green infrastructure to be protected and enhanced where appropriate.

17. AIR QUALITY IMPACTS

17.1. The application is supported by an Air Quality Screening Technical Note. Officials have considered that evidence having regard to baseline conditions, construction dust, operational traffic emissions and potential effects on human and ecological receptors. The site is not within an Air Quality Management Area, and existing air quality is principally influenced by vehicle movements on the surrounding road network.

17.2. Officials consider that construction-phase air quality effects would be temporary and capable of being controlled through a Construction Environmental Management Plan ("CEMP"). That plan should secure dust suppression, wheel washing, road sweeping, management of stockpiles and materials handling, control of construction vehicle and plant emissions, site inspection, monitoring and complaint-response procedures. Subject to those measures, construction dust and particulate matter effects would not be significant.

17.3. Operational air quality impacts would arise principally from traffic. Officials note that anticipated vehicle movements fall below the relevant EPUK/IAQM screening thresholds for detailed dispersion modelling outside an Air Quality Management Area. Officials therefore consider that operational road traffic emissions would not be significant, particularly having regard to the lack of private vehicle use by Service Users, provision of managed Service User transport and on-site facilities, the Travel Plan and operational traffic controls.

17.4. Officials also consider that the proposal is unlikely to give rise to significant air-quality effects on ecological receptors.

17.5. Subject to conditions securing construction-phase mitigation through the CEMP, together with implementation of the Travel Plan and operational traffic management measures, officials consider that the proposal would accord with **Policy P3 of the NPPF, Cherwell Local Plan Policies ESD 10 and ESD 15, and Saved Policy ENV1**, insofar as they relate to air quality effects on human and ecological receptors.

18. NOISE IMPACTS

18.1. The application is supported by a Noise Assessment. Officials have considered that evidence in relation to the proposed accommodation use, the existing baseline noise environment, effects on future occupants, construction noise and potential operational noise effects on nearby receptors. Existing noise conditions are principally influenced by road traffic on the B4011, with the highest levels close to the western edge of the site.

18.2. Officials consider that the site can accommodate the proposed use in noise terms. Most of the site falls within negligible to low noise risk categories, with low to medium noise risk limited to areas closest to the B4011.

18.3. Representations raise concerns regarding construction and operational noise, including effects on nearby residents and the rural character and tranquillity of the surrounding area. The nearest identified residential receptor is Wild Meadow, approximately 296 metres north of the site, with further receptors in Piddington and Upper Arncott. Officials have considered construction activity, operational traffic, fixed plant, wastewater infrastructure, servicing, external recreation and general activity within the site.

18.4. Construction noise would be temporary and managed through the CEMP, including working hours, plant selection, acoustic screening, monitoring and complaint-response arrangements. Any fixed plant or on-site wastewater-treatment infrastructure would be required to demonstrate appropriate noise limits and mitigation as part of the relevant detailed scheme. The separation from nearby receptors, controlled site layout and operating arrangements would also limit operational effects from servicing, recreation and general activity.

18.5. Having regard to the submitted Noise Assessment, the separation from sensitive receptors, the existing noise environment and the recommended controls, officials consider that the development would not cause unacceptable noise effects or a material loss of tranquillity. The proposal would accord with Policies P3 and P4 of the NPPF and Saved Policy ENV1.

19. ECOLOGY AND BIODIVERSITY

19.1. The application is supported by a Preliminary Ecological Appraisal, Habitats Regulations Assessment information and related environmental evidence. Officials have considered that evidence alongside Natural England's consultation response dated 23 September 2026. The site comprises a mosaic of neutral grassland, scrub, hedgerows, buildings, hardstanding, ditch habitat and disused railway features, which together provide ecological value and habitat connectivity (notwithstanding the site's former military use and previously developed character). Existing habitats and ecological constraints are shown in **Annex B, Figure 13 and Figure 14** shows the hedgerows, ditches and features with the potential to support protected species.

19.2. Officials concluded through the Appropriate Assessment that, subject to mitigation secured by condition, the proposal would not adversely affect the integrity of any internationally protected habitat site, either alone or in combination with other plans or projects. The proposal accords with Policy N3 of the NPPF and Cherwell Local Plan Policy ESD 9.

19.3. Natural England has no objection, subject to conditions. Its remaining concern relates to the long-term foul-drainage arrangements. As stated above officials consider that this matter is adequately addressed by the recommended foul-drainage condition, which would prevent occupation of each phase until an acceptable foul-drainage scheme has been submitted, approved and implemented. Subject to that condition, officials consider that the proposal would not result in an unacceptable effect on Arncott Bridge Meadows SSSI and would accord with Policy N6 of the NPPF, Cherwell Local Plan Policy ESD 10 and Saved Policy C1 in this respect.

19.4. The submitted evidence identifies habitats and features capable of supporting protected species, including bats, great crested newts, hazel dormice, badgers, water voles, barn owls and other breeding birds, reptiles and terrestrial invertebrates. Further species-specific surveys are required before demolition, tree removal, vegetation clearance or other works capable of affecting the relevant habitats or species commence. On the evidence presently available, there is nothing to suggest that the necessary avoidance, mitigation, compensation or licensing requirements could not be satisfied, or that any necessary protected-species licence would not be granted. The recommended ecological condition would prevent relevant works from commencing until the required surveys and impact assessment have been completed and all necessary mitigation, compensation and licensing measures have been secured.

19.5. Officials conclude that the proposal accords with **Policy N3 of the NPPF** and **Cherwell Local Plan Policy ESD 9.** Subject to the pre-commencement protected species condition, the completion and approval of the required surveys and impact assessment, and the implementation of all necessary avoidance, mitigation, compensation and licensing measures at the stages required by the approved programme and any applicable

licence, officials consider that the proposal would accord with **Policy N6 of the NPPF**, **Cherwell Local Plan Policies ESD 10 and ESD 11**, and **Saved Policies C1, C2 and C4**.

20. ARCHAEOLOGY AND BUILT HERITAGE

20.1. The application is supported by an Archaeological and Heritage Desk-Based Assessment. Officials have considered that evidence, Historic England's "no-comment" response and the statutory duty under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

20.2. The site contains no designated heritage assets and does not contribute to the significance of the setting of any nearby listed buildings, either functionally or visually. Officials consider, therefore, that the proposal would not harm the setting or significance of nearby listed buildings. The nearest designated assets, including listed buildings in and around Piddington and the Grade II* Church of St Nicholas, are separated from the site by distance, intervening vegetation, built form and topography. Where the proposal is visible, it would be experienced within the context of the established former military estate rather than as part of the setting of those listed buildings. No Conservation Area would be affected. Nearby designated heritage assets are shown in **Annex B, Figure 18.**

20.3. Officials therefore conclude that the proposal would preserve the setting and significance of nearby listed buildings and would not result in harm to designated heritage assets. The proposal is acceptable in this respect, having regard to **Policies HE5 and HE6 of the NPPF** and **Cherwell Local Plan Policy ESD 15**.

20.4. The site forms part of the former Central Ordnance Depot Bicester and contains surviving elements of the Bicester Military Railway including sections of standard-gauge track and associated infrastructure of local historic and evidential value. Although the remains are not identified on a local heritage list, officials consider that they are non-designated heritage assets because they contribute to understanding the depot's former rail-based logistics system. The submitted demolition plan does not identify these remains for removal. Subject to their retention and protection during the works, officials consider that their significance would be preserved and that the proposal would accord with **Policies HE4, HE5 and HE7 of the NPPF and Cherwell Local Plan Policy ESD 15.**

20.5. The site also has archaeological potential, including possible Roman, Anglo-Saxon, medieval and post-medieval remains. A condition requiring a Written Scheme of Investigation would secure appropriate investigation, archaeological monitoring, recording and, where necessary, targeted excavation or strip-map-and-record. Areas of archaeological potential are shown in **Annex B, Figure 20.** Officials therefore conclude that there would be no harm to the designated and non-designated heritage assets.

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21. EFFECTIVE USE OF PREVIOUSLY DEVELOPED LAND

21.1. As explained in section 9, the proposal would make effective use of a substantially underused former military storage and distribution site, with development focused principally on existing hardstanding, retained buildings and other previously developed areas.

21.2. The proposal would accord with **Policy L2** of the NPPF, which supports the effective use of previously developed land and buildings, including through making better use of vacant and underutilised land and buildings, and through appropriate temporary uses. This policy provides that substantial weight should be given to the benefits where a proposal would make better use of underutilised land or effective use of previously developed land.

21.3. As noted in section 9 above, Cherwell Local Plan Policy BSC 2 promotes the effective use of land and the reuse of previously developed land for housing development. Although the proposal would not constitute Class C3 residential development, it would still provide managed residential accommodation and bring previously developed land back into beneficial use. Officials consider, therefore, that the general principle of the policy is met.

22. IMPACT ON LOCAL FACILITIES

22.1. Cherwell Local Plan Policy BSC 9 seeks to ensure that development can be supported by appropriate public services and facilities. Policy HC3 of the NPPF provides that proposals for housing which would give rise to significant numbers of additional people living in an area should be informed by an understanding of the need for any associated improvements to community facilities and public service infrastructure, whether on or off-site, and provide for new or improved community facilities and public service infrastructure which are necessary for the development to be acceptable in planning terms, whether by direct provision or a contribution to off-site improvements. The principal issue for this section is whether the proposed on-site provision would enable the development to operate on a substantially self-contained basis without placing unacceptable pressure on local facilities and services.

22.2. The proposed on-site provision includes accommodation, catering, laundry, welfare support, healthcare facilities, recreation, multi-faith provision, administrative and staff facilities, together with managed transport arrangements. Officials consider that this model would ensure that most day-to-day needs of Service Users could be met on-site, reducing significantly any reliance on facilities in surrounding settlements. However, Service Users would retain access to off-site public services where required, particularly NHS and emergency services. The application does not specify fixed destinations for managed off-

site transport, and references to Bicester or other nearby urban centres are indicative only. The destinations and service arrangements would need to be confirmed through the Operational Management, Safeguarding and Community Cohesion Plan, to be secured by condition. The location and distribution of the proposed on-site facilities are shown in **Annex B, Figures 6–8.**

22.3. NHS Thames Valley Integrated Care Board advises that nearby GP practices have no spare capacity and objects unless appropriate mitigation is secured. The proposed on-site healthcare service would, however, provide initial health assessments and routine primary-care support (commonly provided by GPs), reducing, but not eliminating, demand for off-site NHS services. Service Users may continue to require, for example, specialist primary care, mental-health services, secondary care and emergency treatment. Before occupation of each phase, the scope, staffing, commissioning arrangements and operating hours of the on-site healthcare service, together with prescription, referral, escalation and emergency arrangements, should therefore be approved through the Operational Management, Safeguarding and Community Cohesion Plan. The plan should quantify the anticipated residual demand for off-site NHS services and identify the operational measures necessary to manage that demand. Where the evidence demonstrates that residual effects on local primary-care capacity cannot be adequately mitigated through the approved on-site service and operational arrangements, occupation of the relevant phase should not take place until any additional mitigation demonstrated to be necessary, directly related to the development and proportionate to its impacts has been secured.

22.4. The on-site catering, laundry, welfare, recreation and multi-faith facilities, together with managed transport for necessary off-site journeys to destinations confirmed through the operational transport arrangements, would further limit routine demand on local facilities. The effectiveness of this substantially self-contained model depends on those facilities being provided, fitted out, staffed and available before occupation, and maintained throughout the lifetime of the development. Subject to those controls, the proposal would accord with **Cherwell Local Plan Policy BSC 9 and Policy HC3 of the NPPF**.

22.5. Officials conclude that the proposed operating model and on-site facilities would materially reduce routine Service User demands upon local facilities and services but would not remove them. Subject to the on-site healthcare and welfare facilities, staffing, referral arrangements, managed transport and any additional mitigation demonstrated to be necessary under paragraph 22.3 being secured before occupation of the relevant phase, officials consider that unacceptable pressure on local services would be avoided and that the proposal would accord with Cherwell Local Plan Policy BSC 9 and NPPF policy HC3. Some residual demand on healthcare, emergency and other public services would nevertheless remain, and officials consider it appropriate to give that residual effect limited adverse weight in the planning balance.

23. OVERALL CONCLUSIONS AND PLANNING BALANCE

23.1. Officials have assessed the proposal against the development plan and the NPPF. For the reasons given above, and subject to the recommended conditions, the proposal is considered to accord with the development plan policies identified in the topic-based assessments, save for partial conflict with Cherwell Local Plan Policy SLE 4 arising from the site's restricted sustainable transport accessibility and constrained pedestrian environment. Officials therefore consider that the proposed development accords with the development plan when taken as a whole.

23.2. In relation to the NPPF, officials consider that, as a proposal for development outside of a settlement, policy S5 of the policies on achieving sustainable development applies. As set out above, the proposal is for the redevelopment of previously developed land and therefore satisfies policy S5(1)(d). It therefore follows that the proposal should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF. In relation to policy S5(2), officials have not concluded that the proposal fails to comply with any national decision-making policies which state that development proposals should be refused in specific circumstances.

23.3. The proposal would contribute to meeting the urgent national public-service need for additional asylum accommodation capacity, including the proposal's contribution to addressing the shortage of suitable accommodation and operational headroom, supporting the SSHD's statutory asylum-support functions and improving estate resilience and contingency capacity. This benefit is also being met through the effective use of previously developed land. Officials give **substantial positive weight** to this benefit.

23.4. In relation to adverse effects, as set out above in respect of the topic-based assessments, officials conclude that – subject to the imposition of appropriate conditions – adverse effects arising from the proposed development can be avoided, save that officials afford **limited adverse weight** to the residual transport and accessibility harm arising from the site's restricted sustainable transport accessibility, residual impacts on community cohesion and residual impacts on local facilities and services.

23.5. Having considered all relevant matters individually and cumulatively, officials conclude that the benefits of the proposal would not be substantially outweighed by adverse effects. Officials also conclude that the proposal would accord with the development plan taken as a whole and that planning permission should be granted subject to the recommended conditions.

24. RECOMMENDATION

It is recommended that the application be **GRANTED** planning permission subject to the conditions detailed in **Annex K**.

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Annexes

Annex A – List of technical documents
Annex B – Maps and Visuals

- **Figure 1 to 5** - Site location and context map – site boundary, B4011, Bicester, Upper Arncott, Piddington, Thame, Wild Meadow and HMP Bullingdon (sections 3 and 13).
- **Figure 6 to 8** - Proposed site layout and phasing plan – Phases 1–3, accommodation, retained and demolished buildings, facilities, parking, roads, drainage and site boundaries (sections 2, 12, 13 and 22).
- **Figure 9** - existing buildings
- **Figure 10 to 12** - Environmental designations and water environment map – SSSI Impact Zone, nearby SSSIs, River Ray, Muswell Hill and proposed Local Landscape Designation (sections 3, 14 and 19).
- **Figure 13 to 14** - Ecological constraints plan – habitats, hedgerows, ditches, protected-species features (section 19).
- **Figure 15 to 16** - Landscape and visual plan – Zone of Theoretical Visibility, principal viewpoints, sensitive receptors and proposed mitigation (section 10).
- **Figure 17 -** viewpoints - boundaries, vegetation and nearby receptors
- **Figure 18 to 20** - Heritage and archaeology plan – nearby listed buildings, Bicester Military Railway remains and areas of archaeological potential (section 20).
- **Figure 21 to 28** - Flood-risk and drainage plan – flood zones, surface-water risk, watercourses, drainage assets and outfalls. (section 14).
- **Figure 29** - Tree constraints plan – retained and removed trees, root-protection areas and replacement planting (section 16).
- **Figures 30 and 32–34** – Access and movement plans showing the northern and southern accesses, their relationship with the B4011, internal circulation, pedestrian and cycle routes, nearby bus stops, and proposed managed transport arrangements (section 11).
- **Figure 31** - Annotated site photographs showing the accesses, site boundaries, vegetation and surrounding context (sections 3, 10 and 11).

Annex C – Officials' Site Visit Report

Annex D - Public Sector Equality Duty assessment

Annex E – Statutory Consultee Consultation Responses

Annex F - Local Authority and Parish Council Representations

Annex G - Representations from Critical Infrastructure Providers

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Annex H – MP Representations

Annex I - Other stakeholder representations.

Annex J – Summary of Public Representations

Annex K – Conditions

Annex L – Definitions

Annex M – List of abbreviations

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Annex K

CONDITIONS:

1. **Approved Plans and Documents**

The development shall be carried out in accordance with the approved plans and documents listed below:

Plans

Site Location Plan (Drawing no. BIC-DR-AR-100105-P01)

Site Parameters Plan (Drawing no. BIC-DR-AR-100107-P01 Rev. 2)

Site Demolition Plan (Drawing no. BIC-DR-AR-100108-P01)

Documents

Planning Proposal Statement (Version D, 6th July 2026)

Reason: To ensure the development is carried out in accordance with the approved details.

In the event of any inconsistency between the approved plans or documents and Condition 4, the height limitations and approval requirements in Condition 4 shall prevail.

2. **Time Limit**

The development hereby permitted shall cease no later than **10 years** from the date of the decision notice and, within 6 months of the ceasing of operations, all modular buildings, temporary structures, operational plant, temporary services, security infrastructure approved through this development shall be removed from the site, except to the extent that an item falls within a category expressly listed in Condition 3(c) and is expressly identified for retention in the reinstatement plan approved in writing under that condition.

3. **Reinstatement Plan**

No later than six months prior to the cessation of the development hereby permitted, a reinstatement plan shall be submitted to the Secretary of State for Housing, Communities and Local Government for approval in writing. No deconstruction, removal

or reinstatement works pursuant to Conditions 2 and 3 shall commence until the reinstatement plan has been approved in writing by the Secretary of State for Housing, Communities and Local Government. The reinstatement plan shall include:

a) a timetable for undertaking the reinstatement works;
b) details of the buildings, structures, operational plant, temporary services, security infrastructure and associated infrastructure to be removed;
c) details of any hardstanding, foundations, service trenches, drainage infrastructure, boundary treatment or landscaping to be retained, removed, remediated or reinstated;
d) a method statement detailing how the reinstatement works are to be undertaken; and
e) details of monitoring and remediation arrangements, where required.

The approved reinstatement plan shall be implemented in accordance with the approved timetable. The timetable shall comply with the removal deadline specified in Condition 2. Approval of the reinstatement plan shall not extend the cessation or removal deadlines specified in Condition 2.

4. Building and Operational Development Heights

No new modular accommodation building shall exceed two storeys or 7 metres in height above finished ground level.

Building A6 shall be retained and refurbished without increasing its existing building height. Any roof-mounted plant or equipment shall be subject to the separate height limits and approval requirements in this condition. No roof-mounted plant, equipment, flue, antenna, ancillary structure or other operational development shall exceed 12 metres in height above existing ground level.

Notwithstanding the approved plans, no roof-mounted plant, equipment, flue, antenna, ancillary structure or other operational development other than the modular accommodation buildings themselves exceeding 6 metres in height above existing ground level shall be installed or erected until details of its:

a) siting;
b) maximum height and dimensions;
c) design, materials and external appearance;
d) where relevant, acoustic characteristics and any necessary noise mitigation; and
e) where relevant, landscape and visual mitigation,

have been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The development shall thereafter be carried out and retained in accordance with the approved details.

For the purposes of this condition, “existing ground level” means the ground level immediately before commencement of the development hereby permitted, “finished ground” means the completed external ground level adjoining the relevant building, as shown on the levels drawing approved under Condition 8. Height shall be measured vertically from the applicable ground level specified in this condition to the highest point of the relevant building, structure, plant or equipment. For modular accommodation buildings, where finished ground levels vary around the building, the lowest finished ground level immediately adjoining its footprint shall be used. For structures, plant or equipment subject to a limit measured above existing ground level, the lowest existing ground level beneath the relevant footprint shall be used. For modular accommodation buildings, the full height above finished ground level, including any projecting foundations or supporting structures, shall count towards the 7-metre limit. For structures, plant or equipment subject to a limit measured above existing ground level, any elevation attributable to raised ground levels, foundations, supporting structures or finished floor levels shall count towards that limit. Approval under Condition 8 shall not authorise any exceedance of the height limits specified in this condition.

The levels drawings submitted under Condition 8 shall show existing ground levels, proposed finished ground and floor levels, and maximum roof levels, together with the maximum levels of any plant, equipment or structures above roof level, against a common stated datum, demonstrating compliance with this condition.

The modular accommodation buildings shall be constructed and retained in accordance with the finished ground, floor and maximum roof levels shown on the drawings approved under Condition 8.

For the avoidance of doubt, the 7-metre height limit for new modular accommodation buildings excludes roof-mounted plant and equipment separately approved under this condition. Such plant and equipment may project above the building, provided that its highest point does not exceed 12 metres above existing ground level. This allowance shall not permit additional accommodation floors or any other increase in the height of the modular accommodation building itself.

Reason: To ensure that the development remains within the height parameters specified in this permission and considered in the Officials’ Appraisal Report; to protect landscape character, visual amenity and neighbouring receptors; and to ensure that any plant, equipment or ancillary development exceeding 6 metres is appropriately designed and mitigated; and to ensure that flood risk and drainage measures do not result in those height parameters being exceeded.

5. Limit of Service User Number

No more than 1,256 Service Users may be accommodated on the site at any one time.

The site operator shall maintain an accurate and up to date occupancy record, recording the date and resulting total number of Service Users accommodated at the site whenever that number changes. No separate entry shall be required on days when that number remains unchanged.

The record, including the history of changes in occupancy, shall be retained throughout the operational period of the development and made available to the Secretary of State for Housing, Communities and Local Government on request.

Reason: To ensure that occupancy remains within the capacity of the approved accommodation and facilities and to enable compliance with the occupancy limit to be monitored.

6. Construction Environmental Management Plan (CEMP)

No construction works comprised in the development hereby permitted shall commence until a Construction Environmental Management Plan ("CEMP") has been submitted to and approved in writing by the Secretary of State for Housing, Communities & Local Government. For the purposes of this condition, 'construction works' means construction, installation, demolition, deconstruction, decommissioning, removal and reinstatement works, including any such works undertaken as part of the maintenance of the completed development. Routine maintenance that does not involve any of those works is excluded.

For the purposes of this permission "specified early works" means:

(i) non-invasive assessment of existing drainage connection points, including CCTV surveys undertaken through existing access points;

(ii) non-invasive utility surveys, including ground-penetrating radar; and

(iii) the placement on existing hardstanding of temporary construction fencing, barriers and contractor welfare facilities, and the marking out of pedestrian routes and exclusion zones, including around overhead power lines.

Specified early works shall not include excavation, penetration or removal of hardstanding, vegetation clearance, construction of foundations, new service connections, alteration of drainage infrastructure, changes to ground levels or installation of external lighting.

A separate CEMP may be submitted for the specified early works. It shall identify their location, scope, methods and duration and address the requirements below insofar as relevant to those works, explaining why any requirement is not applicable. It shall include proportionate pollution-prevention measures, protection of existing drainage infrastructure, temporary welfare wastewater arrangements and a reasoned assessment by a suitably qualified ecologist identifying any necessary ecological safeguards. Any such safeguards shall be implemented before and during the activities to which they relate.

Approval of an early-works CEMP shall permit only the specified early works expressly covered by it. No other construction works shall commence until the CEMP applicable to those works has been approved in writing. Approval under this condition shall not remove or vary any requirement imposed by another condition of this permission.

The CEMP shall include:

a) construction working hours, including separate arrangements for any works proposed outside normal working hours;
b) procedures for seeking prior written approval for any out-of-hours works, except in cases of emergency or where works are required for health, safety or environmental protection reasons;
c) arrangements for notifying the local planning authority, local residents and other sensitive receptors of any approved out-of-hours works where reasonably practicable;
d) measures to control construction dust and particulate matter, informed by the Air Quality Screening Technical Note dated 26 June 2026 and relevant IAQM guidance;
e) measures for demolition, earthworks, construction and arrangements for wheel washing, road sweeping, sheeting of vehicles carrying dusty materials, management of stockpiles and materials handling;
f) measures to minimise emissions from construction vehicles, plant and equipment;
g) construction noise and vibration mitigation measures, including plant selection, use of quieter methods where practicable, acoustic screening, location of stationary plant, management of reversing alarms and procedures for particularly noisy activities;
h) surface-water management and pollution-prevention measures, including protection of ditches, drains, watercourses, drainage infrastructure and controlled waters;
i) measures for the storage, handling and containment of fuels, oils, chemicals and other potentially polluting materials;

j) procedures for dealing with spills, leaks, unexpected contamination or pollution incidents;
k) site inspection, monitoring and complaint-response procedures for dust, air quality, noise, vibration and pollution matters;
l) measures to prevent or minimise construction dust, noise, vibration, light spill, traffic disturbance and pollution affecting Wild Meadow, HMP Bullingdon, nearby public rights of way, Piddington and any other sensitive receptors identified in the submitted assessments;
m) measures for identifying and managing asbestos-containing materials, informed by the submitted Asbestos Demolition Survey, including the scope and timing of any further surveys, measures to prevent the release or spread of asbestos during relevant works, and arrangements for recording completion and confirming that affected areas are suitable to be brought into use; and
n) a timetable and responsibility matrix for implementing and monitoring the approved measures.

All construction works to which this condition applies shall be carried out in accordance with the approved CEMP.

Reason: To ensure construction is suitably managed to control effects on nearby receptors, users of public rights of way, site occupants and the surrounding environment during the implementation, deconstruction and reinstatement of the development.

7. Construction Traffic Management Plan (CTMP)

No construction works comprised in the development hereby permitted shall commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the Secretary of State for Housing, Communities & Local Government. The Construction Traffic Management Plan shall include:

a) construction vehicle routing to and from the site, including routes to be used by HGVs, coaches, plant and delivery vehicles;
b) signage at site access points and any temporary traffic management measures required during demolition, enabling works or construction;
c) arrangements for supervising construction vehicle movements to and from the site, including safe access and egress from the B4011;
d) delivery scheduling, HGV management and measures to avoid or reduce AM and PM peak-hour conflicts where practicable;
e) measures to minimise vehicle movements associated with the construction works, including measures to reduce single-occupancy construction worker trips;
f) details of construction staff parking, contractor compound arrangements, loading and unloading areas and temporary storage areas;

g) wheel washing, road sweeping, highway cleaning and other measures to prevent mud, dust and debris being deposited on the public highway;
h) arrangements for managing abnormal loads, plant deliveries, modular unit deliveries and any temporary road occupation or traffic control required;
i) procedures for monitoring compliance with the approved CTMP, including responsibility for implementation and contact details for the site manager or other responsible person; and
j) arrangements for reviewing and updating the CTMP where construction phasing, routing, access arrangements or traffic impacts materially change.

A separate Construction Traffic Management Plan may be submitted for the specified early works defined in Condition 6. It shall address the requirements above insofar as relevant to those works, explaining why any requirement is not applicable, and shall identify:

(i) the access or accesses to be used;
(ii) the types and maximum dimensions of vehicles, anticipated daily vehicle movements, delivery dates or periods and delivery hours;
(iii) routing, visibility, swept-path, turning, waiting and unloading arrangements appropriate to those vehicles; and
(iv) any access improvements, supervision or temporary traffic-management measures necessary before deliveries commence.

Approval of that plan shall permit only the specified early works expressly covered by it. No other construction works shall commence until the Construction Traffic Management Plan applicable to those works has been approved in writing. All vehicle movements associated with the early works shall comply with the approved arrangements. Approval under this condition shall not remove or vary any requirement imposed by any other condition of this permission.

Development shall be carried out in accordance with the approved Construction Traffic Management Plan.

Reason: To protect highway safety, minimise disruption to the surrounding highway network, and manage the transport impacts of construction.

8. Surface Water Drainage Strategy

Except for the specified early works defined in Condition 6 and undertaken in accordance with the safeguards below, no development shall commence within any phase until a detailed surface water drainage strategy for that phase, prepared and/or verified by a suitably qualified and experienced professional appointed by the Secretary of State for the Home Department, has been submitted to and approved in writing by the Secretary of State for Housing, Communities & Local Government.

Before any specified early works commence, a plan and method statement identifying their location, scope and methods shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The submission shall be prepared or verified by a suitably qualified and experienced drainage professional and shall demonstrate that the works would:

(i) not alter ground levels, obstruct surface-water flow paths or modify existing drainage assets;

(ii) protect existing drainage infrastructure from damage and prevent pollution;

(iii) not occupy land required for attenuation or other drainage mitigation measures, or prejudice the design or implementation of the drainage strategy for the relevant phase or wider development; and

(iv) provide safe arrangements for personnel using the early-works areas, including contractor welfare facilities, having regard to the available flood-risk information.

The specified early works shall be undertaken and any temporary facilities retained only in accordance with the approved details. Approval of those details shall permit only the specified early works expressly covered by them and shall not authorise any other development before approval of the detailed surface water drainage strategy for the relevant phase.

The strategy shall be informed by the submitted Flood Risk Assessment and Drainage Design Statement and shall include:

a) verification of flood-risk data, existing site levels, watercourse connectivity, drainage infrastructure, outfalls and the condition and capacity of existing surface-water drainage assets;
b) the proposed surface-water drainage design for the relevant phase, including any retained, repaired, upgraded, replaced or decommissioned drainage assets;
c) levels drawings showing existing ground levels, proposed finished ground and floor levels, maximum roof levels and the maximum levels of any plant, equipment or structures above roof level, all referenced to a common stated datum and demonstrating compliance with Condition 4, including its definitions of existing and finished ground levels, applicable height limits and methods of height measurement. The proposed finished ground and floor levels shall be supported by the verified flood-risk data and modelling, including appropriate freeboard and flood-resistance and resilience measures demonstrating that the development would be safe from flooding for its lifetime, taking account of climate change;
d) plans and supporting assessment identifying safe access and escape routes, surface-water flow paths and exceedance routing, including measures to manage

events exceeding the drainage system's design capacity and blockage or pump failure, demonstrating that floodwater would be directed away from accommodation and other vulnerable areas without increasing flood risk elsewhere;

e) confirmation that any proposed infiltration system would not mobilise contaminants or otherwise give rise to an unacceptable risk to controlled waters;

f) hydraulic modelling demonstrating system performance for the relevant phase and, where necessary, the completed development, including the 1 in 100-year event plus an appropriate climate change allowance;

g) proposed discharge destinations, outfall locations, discharge rates and volumes, supported by surveys, calculations and, where necessary, hydraulic modelling demonstrating adequate receiving capacity without increasing flood risk elsewhere; identification of any third-party rights, approvals or consents required, their status and any known impediments, together with a reasoned assessment of the deliverability of the proposed arrangements:

h) details and calculations for sustainable drainage, attenuation storage, flow controls, any pumping arrangements and water-quality treatment, demonstrating how runoff would be managed for the design event, including the appropriate climate-change allowance, without increasing flood risk elsewhere or causing unacceptable effects on receiving waters;

i) construction-phase surface-water management and pollution-prevention measures;

j) inspection, maintenance, access and management arrangements for the lifetime of the development; and

k) a phasing and implementation timetable.

The proposed ground floor and roof levels, including the elevation attributable to foundations and supporting structures, shall comply with the height limits and measurement provisions in Condition 4. Approval of the strategy under this condition shall not authorise any exceedance of those limits.

Approval of the strategy under this condition does not require separate third-party rights, approvals or consents to have been secured at that stage and does not remove the requirement to obtain them before undertaking the works or commencing the discharges to which they relate.

Reason: To ensure that the development is safe from flooding for its lifetime, does not increase flood risk elsewhere, secures appropriate sustainable drainage and water-quality treatment, protects controlled waters and watercourses, and ensures that no phase is occupied before adequate surface-water drainage infrastructure is in place.

9. Surface Water Drainage Strategy – Implementation

No phase of the development shall be occupied until the surface-water drainage infrastructure, mitigation, outfall arrangements, pumping arrangements, water-quality

treatment and maintenance arrangements required to serve that phase, together with the approved finished ground and floor levels, flood-resistance and resilience measures, safe access and escape routes, exceedance routes, attenuation storage and discharge controls, have been implemented in accordance with the approved Surface Water Drainage Strategy.

For the purposes of this condition, temporary daytime use by construction personnel of contractor welfare facilities forming part of the specified early works defined in Condition 6 shall not constitute occupation of a phase, provided that those facilities are installed and used in accordance with the early-works details approved under Conditions 6 and 8. This exception shall not permit overnight accommodation or occupation by Service Users.

The approved drainage infrastructure and flood-risk mitigation measures shall thereafter be retained, operated, inspected and maintained in accordance with the approved strategy for the lifetime of the development. The approved safe access and escape routes and exceedance routes shall be kept available and free from obstruction.

Reason: To ensure that the development is safe from flooding for its lifetime, does not increase flood risk elsewhere, secures appropriate sustainable drainage and water-quality treatment, protects controlled waters and watercourses, and ensures that no phase is occupied before adequate surface-water drainage infrastructure is in place.

10. Foul Drainage Strategy

No phase of the development hereby permitted shall be occupied until a detailed foul drainage strategy for that phase, prepared and/or verified by a suitably qualified and experienced professional appointed by the Secretary of State for the Home Department has been submitted to the Secretary of State for Housing, Communities and Local Government and approved in writing by the Secretary of State for Housing, Communities and Local Government.

Temporary daytime use by construction personnel of contractor welfare facilities forming part of the specified early works defined in Condition 6 may take place before approval of the phase-specific foul drainage strategy only where the temporary welfare wastewater arrangements have been approved under Condition 6 and implemented before those facilities are first used. Those arrangements shall identify the anticipated wastewater flows, containment and disposal methods, available capacity, collection and receiving-treatment arrangements where applicable, pollution-prevention measures and contingency arrangements. They shall thereafter be maintained throughout use of the facilities. This exception shall not permit overnight accommodation or occupation by Service Users.

The strategy shall include:

a) calculated foul-water flows, including peak flows from Service Users, staff and all associated facilities, taking account of cumulative demand from other occupied phases;

b) details of the proposed connection to the public foul sewer, including connection points, available network and treatment capacity, any necessary infrastructure upgrades, and a programme for implementation supported by a technical assessment prepared or verified by a suitably qualified and experienced professional, using relevant surveys, calculations and, where necessary, modelling, and taking account of available information and responses from the sewerage undertaker. The assessment shall identify its data sources, assumptions, limitations and any unresolved capacity or delivery constraints;

c) where temporary cesspool storage and tankering are proposed pending connection:

I. the location, design, watertightness and usable capacity of storage facilities, including high-level alarms and emergency storage;

II. the maximum number of Service Users to be accommodated under the interim arrangements, supported by calculations accounting for all foul-water flows;

III. the maximum duration of those arrangements, measured from their first use, and a timetable for transition to the public sewer;

IV. evidence of sufficient capacity and acceptance arrangements at the receiving treatment works;

V. tanker capacities, collection frequencies, maximum daily vehicle movements, routes, site access, loading arrangements and collection hours;

VI. measures to control noise, odour, spills and effects on surface water, groundwater and ecological receptors; and

VII. contingency arrangements for missed collections, equipment failure, loss of receiving-treatment capacity or delay to the sewer connection, including monitoring thresholds, assessment of available storage and treatment capacity, and a graduated response proportionate to the identified risk. The arrangements shall specify alternative collection, storage or treatment measures, where these can be implemented within the approved parameters, and defined triggers, timescales and arrangements for restricting further admissions or reducing occupation where necessary to prevent inadequate foul-drainage provision or unacceptable environmental effects. They shall also specify the criteria for resuming admissions or restoring occupancy once adequate provision has been demonstrated;

d) justification and technical assessment of any alternative on-site treatment or discharge arrangement, including treatment capacity, effluent quality, receiving-environment effects, environmental permitting requirements and its integration with the overall foul-drainage system and system wide contingency arrangements. The detailed assessment and approval of treatment-works sludge handling, noise, odour and plant-specific operational controls shall be undertaken under Condition 24 and shall not require separate approval under this condition;

e) inspection, maintenance, monitoring, incident-response and management responsibilities, together with arrangements for recording occupancy, wastewater quantities, tanker collections and disposal destinations; and

f) an implementation and verification programme.

Except for temporary daytime use of contractor welfare facilities expressly permitted above, no phase shall be occupied until the foul-drainage infrastructure and mitigation required to serve that phase have been implemented and are operational in accordance with the approved strategy, and the verification evidence required by the approved implementation and verification programme has been submitted to the Secretary of State for Housing, Communities and Local Government.

For any on-site wastewater treatment works, the plant-specific inspection, maintenance, monitoring and incident-response details required under paragraph (e) shall be secured under Condition 24. The strategy under this condition shall address system-wide responsibilities and interfaces and may cross-refer to those details without requiring their separate approval under this condition.

The development shall thereafter operate in accordance with the approved strategy. The maximum occupancy, wastewater flows, tanker movements and duration of interim arrangements specified in the strategy shall not be exceeded.

A revised strategy may be submitted to the Secretary of State for Housing, Communities and Local Government for approval in writing. It shall identify and justify the proposed changes, address the requirements of this condition relevant to these changes, and demonstrate adequate capacity and operational resilience without unacceptable effects on water quality, ecological receptors, neighbouring amenity or highway safety, taking account of cumulative effects across occupied phases.

No revised arrangement shall be implemented until the revised strategy has been approved in writing and any infrastructure and mitigation required for its implementation are operational. Until then, the previously approved strategy and limits shall continue to apply. Any revised interim duration shall be measured from the first use of the original interim arrangements and shall not restart upon approval of a revised strategy.

On expiry of the approved interim period, occupation dependent on those arrangements shall cease unless the approved replacement foul-drainage system is operational or a revised interim period has already been approved under this condition. Any restrictions or reductions in occupation required by the approved contingency arrangements shall be implemented within the approved timescales.

Approval of a revised strategy under this condition shall not vary the occupancy limit in Condition 5, the deadlines in Condition 2 or any other requirement of this permission.

Reason: To ensure adequate foul-drainage provision before occupation of each phase; prevent water pollution and adverse effects on controlled waters, designated ecological sites and other sensitive receptors; protect neighbouring amenity and highway safety; and ensure that interim tankering remains limited to the capacity and duration demonstrated to be acceptable.

11. Contamination Risk Assessment

Except for investigation works undertaken in accordance with the requirements below, no intrusive groundworks or other works capable of disturbing or mobilising contamination, creating or altering pollutant pathways, or prejudicing subsequent contamination investigation or remediation shall commence within any phase until a contamination risk assessment covering that relevant phase has been completed by a suitably qualified contaminated land practitioner appointed by the Secretary of State for the Home Department, submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government.
The contamination risk assessment must:

a) identify the likely location and nature of any substances in, on, under or over the part of the application site to which it relates, whose presence may give rise to a relevant contamination risk, and

b) assess assess the risks arising from the identified contamination during construction and the subsequent permitted use, including risks to construction personnel, future occupants, neighbouring receptors, controlled waters and the environment, and identify whether remediation or other protective measures are necessary to make the relevant phase suitable for its permitted use.

The specified early works defined in Condition 6 remain subject to this condition. Their description as early works shall not exempt any activity capable of disturbing or mobilising contamination, creating or altering pollutant pathways, or prejudicing subsequent contamination investigation or remediation.

Non-intrusive surveys, inspections and other works falling outside the restriction in the first paragraph may proceed before approval of the contamination risk assessment, provided that, before those activities commence, the Secretary of State for Housing, Communities and Local Government has been provided with:

c) a plan and description identifying their location, scope and methods; and
d) written confirmation from a suitably qualified contaminated land practitioner, supported by a reasoned assessment, that they would not disturb or mobilise contamination, create or alter pollutant pathways, or prejudice subsequent investigation or remediation.

Intrusive investigation works necessary to inform the contamination risk assessment may proceed before its approval only in accordance with an investigation method statement prepared or verified by a suitably qualified contaminated land practitioner and submitted to and endorsed in writing by the Secretary of State for Housing, Communities and Local Government before those investigation works commence. The method statement shall identify the scope, locations and methods of investigation, measures to prevent the mobilisation or spread of contamination, and arrangements for managing excavated materials and protecting groundwater and other receptors.

Any remediation required under Condition 12 shall be undertaken in accordance with the scheme and implementation programme approved under that condition, including all measures required before the relevant construction activity commences.

Reason: To ensure that potentially contaminated land is appropriately investigated before works capable of disturbing contamination or prejudicing remediation commence; to protect groundwater and other receptors; and to allow activities that do not compromise those objectives to proceed without unnecessary delay.

12. Remediation Scheme

Where the contamination risk assessment approved under Condition 11 identifies that remediation or other protective measures as necessary to address contaminayion risks during construction or to make the relevant phase suitable for its permitted use , or the investigation and the risk assessment approved under Condition 15 identifies that remediation is necessary, no construction work to which those risks or measures relate shall commence ore resume, and the relevant phase shall not be occupied, until a remediation scheme, including an implementation programme and verification plan, has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government.

The remediation scheme shall:

a) be prepared, or verified by, a suitably qualified contaminated land practitioner appointed by the Secretary of State for the Home Department;

b) describe the measures necessary to remediate the contamination and address the identified risks, including measures to ensure that the construction work to which it relates does not give rise to significant harm or significant pollution and the relevant phase is suitable for its permitted use("scheme measures");

c) specify:

(i) the risks that the scheme measures are to address;

(ii) the remediation options considered and reasons for selecting the preferred option;

(iii) the criteria for demonstrating that the scheme measures have effectively addressed the identified risks;

(iv) arrangements for managing the movement, reuse and disposal of materials, including measures to assess the suitability of any imported material;

d) an implementation programme identifying the sequence of remediation and construction activities, the measures required before particular construction activities commence or resume, those to be undertaken alongside or as part of construction, and any inspection or verification stages required before subsequent activities proceed;

e) include a verification plan specifying:

(i) the data and evidence to be collected to demonstrate completion and effectiveness of the scheme measures, and

(ii) any requirements for longer-term monitoring of pollutant linkages, maintenance and contingency action;

The approved scheme measures shall be implemented in accordance with the approved implementation programme. Remediation may be undertaken alongside or as part of construction only where expressly provided for in that programme. No construction activity shall commence or resume until the scheme measures and verification stages identified as prerequisites to that activity have been completed.

Before occupation of the relevant phase, all remediation measures necessary for its safe occupation shall be completed and the verification requirements of Condition 14 shall be satisfied. Any approved longer-term monitoring, maintenance and contingency measures shall thereafter be implemented for the periods specified in the approved scheme.

For the purposes of this condition, temporary daytime use by construction personnel of contractor welfare facilities forming part of the specified early works defined in Condition 6 shall not constitute occupation of a phase, provided that the requirements of Condition 11 applicable to those activities have been satisfied and any remediation and verification measures required under Conditions 12 or 15 before that use begins have been completed. This exception shall not permit overnight accommodation or occupation by Service Users.

Reason: To ensure that contamination risks are appropriately mitigated and remediated, protect groundwater and other receptors, and allow remediation to be coordinated with construction without compromising the protection necessary before particular activities or occupation commence.

13. Contamination Risk Notice

Where the suitably qualified contaminated land practitioner carrying out a Contamination Risk Assessment concludes that the construction work to which that risk assessment relates will not give rise to significant harm or significant pollution or a significant possibility of significant harm or significant pollution, the Secretary of State for the Home Department must give the Secretary of State for Housing, Communities & Local Government, in respect of that construction work:

a) a notice setting out that conclusion, and
b) the suitably qualified contaminated land practitioner's confirmation of that conclusion.

Reason: To ensure works in contaminated areas do not present a risk to groundwater and potential sources of contamination associated with the historical use of the Site are appropriately mitigated and remediated in accordance with national policy.

14. Remediation Verification Report

Where remediation is required under Condition 12, including remediation arising from previously unidentified contamination investigated under Condition 15, the relevant phase shall not be occupied until the site controller has:

a) notified the Secretary of State for Housing, Communities and Local Government of the remediation measures undertaken, and their completion; and
b) submitted to the Secretary of State for Housing, Communities and Local Government:

(i) a verification report prepared by a suitably qualified contaminated land practitioner appointed by the Secretary of State for the Home Department, consistent with the verification plan approved under Condition 12; and
(ii) the practitioner's reasoned confirmation that the completed measures have achieved the approved remediation criteria, that the relevant phase is suitable for its permitted use, and that any remaining construction works will not give rise to significant harm or significant pollution, or a significant possibility of significant harm or significant pollution.

The verification report shall identify any approved longer-term monitoring, maintenance or contingency measures that remain necessary. Those measures shall be implemented in accordance with the approved requirements.

For the purposes of this condition, temporary daytime use by construction personnel of contractor welfare facilities forming part of the specified early works defined in Condition 6 shall not constitute occupation of a phase, provided that the requirements of Condition 11 applicable to those activities have been satisfied and any remediation and verification measures required under Conditions 12 or 15 before that use begins have been completed. This exception shall not permit overnight accommodation or occupation by Service Users.

Reason: To verify that the required remediation has been completed and that the relevant phase is suitable for its permitted use, and to ensure that any necessary longer-term monitoring, maintenance and contingency measures are implemented to protect human health, groundwater and other receptors.

15. Previously Unidentified Contamination

If contamination not previously identified is encountered during development, works in the affected area, together with any works elsewhere capable of disturbing or mobilising that contamination, creating or altering pollutant pathways, or prejudicing its investigation or remediation, shall cease immediately.

The discovery shall be notified without delay to the Secretary of State for Housing, Communities and Local Government. A suitably qualified contaminated land practitioner shall promptly assess the discovery and identify the affected area, relevant pollutant pathways and any immediate protective measures required.

Unrelated works elsewhere on the site may continue only where the practitioner has prepared a reasoned assessment identifying their location, scope and methods and confirming that they would not disturb or mobilise the contamination, create or alter pollutant pathways, or prejudice its investigation or remediation. That assessment shall be provided to the Secretary of State for Housing, Communities and Local Government before those works continue.

The cessation requirement shall not prevent immediate measures necessary to make the affected area safe or prevent the spread of contamination, or investigation works undertaken in accordance with a method statement approved in writing by the Secretary of State for Housing, Communities and Local Government.

The investigation findings and an assessment of the risks arising from the previously unidentified contamination shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. Where

remediation is necessary, a remediation scheme, including an implementation programme and verification plan, shall be submitted to and approved in writing under Condition 12. Verification shall be undertaken in accordance with Condition 14.

Where remediation is necessary, restricted works shall not resume until the remediation scheme has been approved in writing and all measures and verification stages identified as prerequisites to their resumption have been completed. The approved remediation scheme shall thereafter be implemented in accordance with the approved programme. Where the approved investigation findings and risk assessment demonstrate that remediation is unnecessary, restricted works may resume in accordance with those approved findings and any protective measures specified in them.

Before occupation of the relevant phase, all remediation measures necessary for its safe occupation shall be completed and the notification and verification requirements of **Condition 14** shall be satisfied. Any approved longer-term monitoring, maintenance and contingency measures shall thereafter be implemented for the periods specified in the approved remediation scheme.

Reason: To ensure that previously unidentified contamination is appropriately investigated and addressed; to protect human health, groundwater and other receptors; and to allow unrelated works to continue where they would not compromise investigation, remediation or environmental protection.

16. Unexploded Ordnance (UXO) Risk Mitigation

No intrusive groundworks shall commence within any phase until a UXO Risk Mitigation Scheme for that phase has been prepared by a competent authority appointed by the Secretary of State for the Home Department, submitted to the Secretary of State for Housing, Communities and Local Government and endorsed in writing by that Secretary of State.

The scheme shall be informed by the submitted Preliminary UXO Risk Assessment and shall include:

a) identification of the intrusive works to which the scheme applies;
b) the level of UXO risk associated with those works;
c) site-specific UXO / Explosive Awareness training requirements for personnel undertaking or supervising intrusive works;
d) procedures for briefing contractors and maintaining records of completed training;
e) an Emergency Response Plan setting out the procedures to be followed if suspected UXO is encountered, including immediate cessation of works in the affected area, exclusion arrangements, notification procedures and responsibilities; and

f) arrangements for implementing and monitoring the endorsed measures throughout the relevant intrusive works phase.

Intrusive groundworks shall thereafter be carried out only in accordance with the endorsed UXO Risk Mitigation Scheme for the relevant phase.

Reason: To ensure that the low but identifiable risk of encountering unexploded ordnance arising from the site's former military use is appropriately managed during intrusive works, in the interests of construction safety, public safety and the safe implementation of the development.

17. Operational Management, Safeguarding and Community Cohesion

No phase of the development shall be occupied until a schedule of planning-mitigation measures forming part of the Operational Management, Safeguarding and Community Cohesion Plan has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The schedule shall identify the measures serving that phase, taking account of cumulative demand from all occupied phases, and shall include:

a) the healthcare, welfare, recreation, multi-faith, catering, laundry and associated support facilities to be fitted out and available before occupation, including their capacity and arrangements for maintaining their availability and accessibility to Service Users during occupation;
b) details of the scope, capacity and availability of on-site healthcare provision to meet the anticipated needs of Service Users; an assessment of anticipated residual demand on off-site NHS services; and measures necessary to prevent unacceptable pressure on local primary-care capacity, together with arrangements for liaison with relevant health partners and monitoring and review of the effectiveness of those measures;
c) community liaison and complaint-response arrangements addressing the development's effects on neighbouring amenity and community cohesion, including a publicly available contact point, liaison with the local authority, police, health partners and local community, and procedures for recording, investigating and responding to relevant complaints and incidents;
d) managed Service User transport measures securing safe and accessible sufficient transport to necessary services and destinations, identifying the mitigation outcomes to be maintained and arrangements for monitoring demand, reviewing adequacy and adapting provision to changing needs. Routes, destinations, frequency, operating hours and vehicle types may be adjusted without further approval under this condition, provided that the approved planning mitigation outcomes continue to be met and the adjustments are not capable of giving rise to

materially different planning effects. Adjustments that do not meet those criteria shall require prior written approval from the Secretary of State for Housing, Communities and Local Government. Changes affecting access use or vehicle routing shall also comply with Condition 22; and

e) an implementation timetable, responsibility for delivery, and monitoring and review arrangements for the measures specified above, including review before occupation of further phases and where changes in demand or monitoring identify a need for revised mitigation.

The approved measures required to serve a phase shall be implemented before occupation of that phase and shall thereafter be maintained and delivered throughout its occupation in accordance with the approved schedule. Material changes to the planning-mitigation arrangements in the approved schedule which are capable of giving rise to materially different planning effects shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government before implementation. Pending approval and implementation of those changes, the previously approved arrangements shall continue to apply. Other changes may be made without further approval under this condition, provided that the approved planning mitigation outcomes continue to be secured and all other conditions of this permission remain satisfied.

The specific requirements governing changes to managed Service User transport in the transport bullet above shall prevail over the general amendment provision. Any consequential update to the Travel Plan required under Condition 25 shall record the revised arrangements in accordance with its approved review procedures and shall not require duplicate approval of the managed Service User transport measures. Where a change also requires approval under Condition 22, a single coordinated submission may address both conditions, clearly identifying the matters requiring approval under each.

Approval under this condition is confined to the planning-mitigation schedule. Other provisions of the Operational Management, Safeguarding and Community Cohesion Plan, including detailed staffing, commissioning, suitability assessment, allocation, individual case-management and internal service-delivery procedures, do not require approval under this condition and may be updated without further approval, provided that the approved planning-mitigation measures continue to be delivered and all other conditions of this permission remain satisfied.

Reason: To secure the facilities and operational mitigation necessary to provide an acceptable living environment, address impacts on local healthcare services, secure safe and accessible Service User transport, and manage effects on neighbouring amenity and community cohesion, without prescribing detailed service-delivery arrangements unrelated to those planning objectives.

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18. Archaeology and Historic Environment Recording

No construction work, other than preliminary or site preparatory works subject to the safeguards below, shall commence within the relevant area until a Written Scheme of Investigation ("WSI") has been prepared by a suitably qualified and experienced professional appointed by the Secretary of State for the Home Department and submitted to the Secretary of State for Housing, Communities and Local Government for information and written acknowledgement of receipt
The WSI shall include:

a) the scope and methodology for archaeological monitoring during demolition, removal of hardstanding and intrusive groundworks;
b) provision for targeted excavation, strip-map-and-record or other appropriate archaeological mitigation if archaeological remains are encountered;
c) arrangements for identifying, protecting and recording archaeological remains, railway elements or other historic features unexpectedly affected by preliminary or site preparatory works;
d) arrangements for liaison with the Oxfordshire Historic Environment Record Officer;
e) arrangements for reporting, publication and deposition of the resulting records and archive; and
f) a timetable for implementation, identifying measures required before and during the relevant works.

Preliminary or site preparatory works may commence or continue before submission of the WSI or receipt of written acknowledgement, provided that a suitably qualified and experienced archaeological professional has identified any necessary archaeological safeguards and those safeguards are implemented before and during the relevant works. Such works shall not prejudice subsequent archaeological investigation or recording.

Submission of the WSI is required for information and does not require formal approval or discharge before works may proceed. Written acknowledgement confirms receipt only; its absence shall not prevent works from proceeding once the applicable requirements of this condition have been satisfied.

The development shall be carried out in accordance with the submitted WSI and its implementation timetable. Nothing in this condition removes or varies any requirement imposed by another condition of this permission.

Reason: To ensure that archaeological remains and non-designated heritage assets affected by the development are appropriately identified, recorded and, where necessary, investigated, and that the results are made publicly accessible, while

allowing preliminary and site preparatory works to proceed with appropriate archaeological safeguards.

19. Protected Species Surveys, Mitigation and Licensing

Except for investigation works undertaken in accordance with the requirements below, no demolition, tree removal, vegetation clearance, ground clearance, installation of external lighting, or other development capable of affecting protected species or their habitats shall commence within any phase until:

a) any protected-species surveys identified as necessary by a suitably qualified ecologist, having regard to the adequacy and currency of existing survey evidence, the habitats present and the nature and potential effects of the works proposed within the relevant phase, have been undertaken at appropriate times of year and in accordance with current recognised survey guidance. The Protected Species Survey and Mitigation Report required under paragraph (b) shall explain and justify the survey scope, including any conclusion that further surveys are unnecessary;

b) any protected species survey and Mitigation Report prepared by a suitably qualified ecologist has been submitted to the Secretary of State for Housing, Communities and Local Government. The survey findings and the ecologist's reasoned assessment shall be submitted for information and shall not require written approval or endorsement before works commence. Detailed lighting design and its associated implementation, operation and maintenance requirements shall be submitted and determined solely under Condition 21 and shall not require separate approval under this condition. This does not remove the requirement to identify ecological lighting constraints and safeguards under paragraph (vii), or to secure any necessary ecological safeguards for lighting excluded from Condition 21. The Report shall separately identify and justify any avoidance, mitigation, compensation, habitat-protection, lighting, monitoring or management measures necessary to make the relevant works acceptable in planning terms, together with their implementation programme. Those measures and that programme shall require written approval before the works to which they relate commence. Where the ecologist concludes that no such measures are necessary, the Report shall explain and justify that conclusion, and no written approval or endorsement shall be required under this paragraph. All safeguards required before the relevant activities shall be implemented, and any necessary protected-species licence obtained, before those activities commence.

Intrusive investigations necessary to inform surveys, assessments or strategies required under other conditions of this permission may proceed before the requirements of paragraphs (a) and (b) have been satisfied, provided that, before those investigations

commence, a suitably qualified ecologist has prepared a written assessment identifying the investigation locations, scope and methods, their potential effects on protected species and their habitats, and any necessary ecological surveys, pre-start checks, avoidance measures, timing restrictions, working methods and supervision. All safeguards identified as prerequisites shall be implemented before the investigations commence, and the investigations shall thereafter be undertaken in accordance with that assessment and any necessary protected-species licence, which shall be obtained before the activities requiring it commence.

This exception applies only to the investigation works and associated access and reinstatement strictly necessary to undertake them. It does not authorise substantive construction or enabling works, prejudice subsequent ecological mitigation, or remove or vary any requirement imposed by another condition of this permission.

The surveys required under paragraph (a) shall address, where relevant to the habitats and works within the phase:

- roosting, foraging and commuting bats, including affected buildings and trees;
- great crested newts;
- hazel dormice;
- badgers;
- water voles;
- barn owls and other breeding birds;
- reptiles; and
- terrestrial invertebrates.

The Protected Species Survey and Mitigation Report shall include:

(i) the methods, dates, limitations and results of the surveys undertaken;

(ii) an assessment of the effects of the relevant works on protected species, their resting places, breeding sites, habitats and movement corridors;

(iii) details of measures to avoid harm and, where harm cannot be avoided, the mitigation and compensation measures to be implemented;

(iv) species-specific working methods, timing restrictions, exclusion zones, ecological supervision and pre-commencement checks;

(v) measures for the protection and retention of habitats and ecological connectivity, including trees, hedgerows, scrub, grassland, ditches and disused railway features;

(vi) details of any temporary or permanent replacement habitat, roosting, nesting or refuge provision;

(vii) identification of retained and created habitats, bat-roost features, commuting routes and other sensitive ecological receptors, together with the ecological lighting constraints and safeguards to be incorporated into the lighting strategy required under Condition 21, demonstrating how those receptors would be protected from unacceptable light spill;

(viii) details of any protected-species licence required, together with information sufficient to demonstrate that there is no apparent impediment to the grant of that licence;

(ix) arrangements for ecological supervision, monitoring, remedial action and reporting; and

(x) an implementation programme identifying the measures required before, during and after the relevant works.

19. Protected Species – Implementation and Maintenance.

The development shall be carried out strictly in accordance with the measures and implementation programme approved under condition 19 and the requirements of any protected-species licence. All approved habitat-protection, mitigation, compensation, replacement-habitat, monitoring and management measures shall be implemented in accordance with that programme and thereafter retained and maintained for the periods specified in the approved details. Detailed lighting design, installation and operation shall be governed by the External Lighting Condition. Lighting excluded from that condition shall comply with any applicable ecological safeguards approved under condition 19.

Reason: To secure implementation, retention and maintenance of the approved protected-species mitigation, compensation and habitat-protection measures, together with the necessary monitoring and management.

20. Previously Unidentified Protected Species

If a protected species not previously identified is encountered during the development, works capable of affecting that species or its breeding sites, resting places or habitats shall cease immediately in the affected area. A suitably qualified ecologist shall assess the discovery, identify the affected works and any necessary immediate protective measures, and prepare a reasoned written assessment specifying the safeguards, working methods, supervision, and licensing requirements necessary for works to

recommence. The discovery and assessment shall be notified to the Secretary of State for Housing, Communities and Local Government before affected works recommence.

Where the ecologist demonstrates that the necessary measures fall within the mitigation framework approved under this condition 19 and would not materially alter the assessed ecological effects, the affected works may recommence following that notification, without written approval or endorsement, once all safeguards identified as prerequisites have been implemented and any necessary protected-species licence obtained. The works shall thereafter proceed in accordance with the notified assessment.

Where new or materially revised mitigation or compensation outside that approved framework is required, those measures and their implementation programme shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government before the works to which they relate recommence. All measures identified as prerequisites to recommencement shall first be implemented and any necessary protected-species licence obtained. Unrelated works may continue where the ecologist's written assessment confirms that they would not affect the species or its breeding sites, resting places or habitats, or prejudice the necessary mitigation.

Changes to lighting governed by the External Lighting Condition shall require approval under that condition only, before the affected lighting is installed or brought back into operation. The cessation requirement shall not prevent immediate protective measures undertaken in accordance with the ecologist's advice and any applicable licensing requirements.

Reason: To protect previously unidentified protected species and their breeding sites, resting places and habitats, and to ensure that affected works resume only with the necessary safeguards and licensing arrangements in place.

21. Arboricultural Impact Assessment, Method Statement and Tree Protection

No demolition, vegetation clearance, site clearance, excavation, service installation, groundworks or construction works capable of affecting retained trees, hedgerows or their root protection areas, whether directly or through associated access, plant movements, storage or changes in ground levels, shall commence within any phase until an Arboricultural Impact Assessment and an Arboricultural Method Statement relevant to those works have been prepared and/or verified by a suitably qualified and experienced arboriculturist appointed by the Secretary of State for the Home Department and submitted to and endorsed in writing by the Secretary of State for Housing, Communities and Local Government.

Unrelated works may proceed before submission or endorsement of those documents, provided that a suitably qualified and experienced arboriculturist has prepared a reasoned written assessment identifying their location, scope and methods and confirming that they would neither affect retained trees, hedgerows or their root protection areas nor prejudice their protection or the retention decisions to be informed by the Arboricultural Impact Assessment. That assessment shall be submitted to the Secretary of State for Housing, Communities and Local Government for information before those works commence.

All protective fencing, ground protection and other safeguards identified as prerequisites to potentially affecting works shall be installed before those works commence and maintained for the required duration. The works shall be undertaken with the arboricultural supervision specified in the Arboricultural Method Statement. Nothing in this provision removes or varies any requirement imposed by another condition of this permission.

The Arboricultural Impact Assessment and Arboricultural Method Statement shall be informed by the submitted Tree Survey and Tree Constraints Plan and shall include:

- a schedule and plan identifying all trees, groups, hedgerows and areas of trees to be retained and removed;
- an assessment of the impacts of the proposed phase on retained trees, including impacts on root protection areas, canopies, access routes, services, levels and construction working areas;
- tree protection plans showing the location and specification of protective fencing and ground protection measures, prepared in accordance with BS 5837:2012;
- details of any works proposed within or adjacent to root protection areas, including any special construction methods, no-dig construction, hand-digging, service installation methods or ground-protection requirements;
- details of any pruning, facilitation or remedial works to retained trees;
- arrangements for arboricultural supervision and monitoring, including the stages of work requiring attendance by a suitably qualified arboriculturist;
- measures to prevent soil compaction, changes in ground levels, storage of materials, fires, contamination or vehicle movements within protected areas; and
- a timetable for implementation.

The development shall thereafter be carried out in accordance with the endorsed Arboricultural Impact Assessment and Arboricultural Method Statement.

Reason: To ensure that retained trees, hedgerows and arboricultural features are adequately protected during demolition and construction, in the interests of visual amenity, landscape character, biodiversity and the satisfactory integration of the development into its surroundings.

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22. Landscape and Visual Management Plan

Where new planting or boundary treatment is required to serve or mitigate the landscape or visual effects of a phase, no part of that phase shall be occupied until details of those measures and their implementation programme have been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The details shall include any measures located elsewhere on the site which are necessary for that phase.

Wider or site-wide landscaping not required to mitigate the effects of the relevant phase may be delivered in accordance with an overall implementation programme submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. That programme shall not defer measures necessary to make an occupied phase acceptable in landscape or visual terms.

Where no new planting or boundary treatment is required to serve or mitigate the effects of a phase, no submission or approval is required for that phase under this condition. This exception does not remove or vary any requirement imposed by another condition of this permission or any obligation under an approved overall implementation programme.

The approved details and implementation programme shall identify any measures required before occupation and any planting to be delivered subsequently. Measures identified as necessary before occupation shall be completed before the relevant phase is occupied. Phase-specific planting not required before occupation shall be completed no later than the end of the first planting season following first occupation of that phase. Wider or site-wide landscaping shall be implemented in accordance with the approved overall implementation programme.

The details submitted under this condition shall include management and maintenance arrangements, identify responsibility for their implementation and specify their duration. The approved planting and boundary treatments shall be managed and maintained in accordance with those arrangements and retained for the duration of the development, unless their earlier removal or alteration is expressly provided for in the reinstatement plan approved under Condition 3.

Any tree or shrub that dies, is removed or becomes seriously damaged within five years of planting shall be replaced during the next planting season with one of equivalent planting size and either the same species or an appropriate alternative species of comparable mature form, landscape function and ecological value, selected by a suitably qualified and experienced landscape professional. Substitutions meeting these criteria shall not require further approval under this condition. Any replacement departing from these criteria shall require prior written approval from the Secretary of State for Housing, Communities and Local Government.

Reason: To secure the landscape mitigation relied upon in assessing the proposal, ensure its timely delivery alongside the relevant phases, and integrate the development with retained vegetation and the surrounding former military estate.

23. External Lighting

No new external lighting associated with the development and capable of causing material light spill shall be installed or operated within any phase, and no existing external lighting shall be materially altered in connection with the development, until a lighting strategy covering that lighting for that phase, which has been prepared and/or verified by a suitably qualified and experienced lighting professional appointed by the Secretary of State for the Home Department, has been submitted to and approved in writing by the Secretary of State for Housing, Communities & Local Government.

Existing external lighting, including security lighting, retained without material alteration may continue to operate without submission or approval of a lighting strategy under this condition. For these purposes, a material alteration includes a change in location, height, light output, beam direction, controls or operating hours capable of materially changing its effects on residential or visual amenity, habitats or light-sensitive species. This provision does not remove or vary applicable ecological safeguards secured under Condition 18 or any protected-species licensing requirement.

The strategy shall be in accordance with the Institute of Lighting Professionals, ILP (2023) Guidance Note: GN08/23 and include the location, heights, design, luminescence, beam direction, hours of operation and control arrangements for the proposed lighting, together with lighting-contour plans demonstrating that effects on nearby residents, on-site sleeping accommodation, retained habitats and light-sensitive species would be acceptable.

The strategy shall incorporate the ecological lighting constraints and safeguards identified in the Protected Species Survey and Mitigation Report submitted under Condition 18, including any subsequently approved additional ecological measures. It shall be informed by advice from a suitably qualified ecologist and demonstrate how retained and created habitats, bat-roost features, commuting routes and other sensitive ecological receptors would be protected from unacceptable light spill. It shall also specify any necessary ecological compliance checks, monitoring, remedial measures and maintenance arrangements.

The new or materially altered lighting covered by the approved strategy shall thereafter be installed, operated and maintained in accordance with that strategy, including its ecological safeguards, control arrangements and any monitoring or remedial

requirements. The requirement to submit and obtain approval of a strategy under this condition does not apply to low-level, downward-facing porch, doorway or entrance lighting that is required for safe access and is designed to minimise light spill. Such lighting shall nevertheless comply with any applicable ecological safeguards secured under Condition 18 and the requirements of any protected-species licence.

Reason: To protect residential and visual amenity and avoid adverse effects on retained habitats and light-sensitive species.

24. Highway Safety, and Access

No phase of the development shall be occupied, and no access shall first be brought into operational use in connection with the development until a Highway Safety and Access Scheme covering that phase and the access arrangements serving it, or the proposed operational use of that access, as applicable, has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government, following consultation with Oxfordshire County Council as the local highway authority in accordance with the procedure below. The scheme shall take account of cumulative operational demand from other occupied phases.

A separate Highway Safety and Access Scheme may be submitted for the specified early works defined in Condition 6. It shall demonstrate safe and suitable access for the vehicle types and movements associated with those works and identify any access improvements, visibility requirements, routing restrictions, supervision or traffic-management measures necessary before that use begins. Those measures shall be implemented before the relevant movements commence. Approval shall permit only the access use expressly covered by that scheme and shall not authorise access for other construction works or operational use before approval and implementation of the scheme applicable to that use. A coordinated submission may address this condition and Condition 7, clearly identifying the requirements addressed under each.

Oxfordshire County Council shall be provided with the scheme and its supporting technical information and invited to comment within 21 days of receipt. Following receipt of its response, or expiry of that period if no response has been received, the Secretary of State for Housing, Communities and Local Government may determine the submission on the available evidence, taking account of any representations received before determination. Receipt of a response or agreement from Oxfordshire County Council shall not be a prerequisite to determination. The absence of a response shall not constitute approval of the scheme or evidence that the proposed arrangements are acceptable.

The scheme shall:

a) identify the northern and southern accesses and specify the approved operational role of each access;
b) identify the access to be used as the principal operational access;
c) identify the access or accesses to be used by staff, visitors, managed Service User transport, coaches, minibuses, taxis, service vehicles, refuse vehicles, delivery vehicles and emergency vehicles;
d) include access drawings, measured visibility splays and swept-path analysis for all vehicle types proposed to use each access;
e) include details of access geometry, gate setbacks, security and gate-management arrangements, internal circulation, waiting and turning areas and measures to prevent queuing on the B4011;
f) identify all access, highway, signage, lighting and traffic-management works necessary to make each access safe and suitable for its approved use;
g) include the routing arrangements applicable to each category of vehicle; and
h) include a phased programme for implementation, monitoring and review, identifying the works and measures required before occupation of each phase or first operational use of each access, taking account of cumulative operational demand.

Before occupation of the phase or first operational use of an access, whichever occurs first, all works and measures identified in the approved scheme as necessary for that occupation or operational use shall be completed.

Thereafter, the accesses shall be operated in accordance with the approved Highway Safety and Access Scheme, subject to the flexibility below. Changes to access use or vehicle routing, including changes associated with managed Service User transport under Condition 16, may be made without further approval under this condition where a reasoned written assessment by a suitably qualified and experienced highways professional demonstrates that they would not give rise to materially different highway or safety effects, taking account of cumulative operational demand, and would continue to secure the approved safety outcomes. The assessment shall be submitted to the Secretary of State for Housing, Communities and Local Government for information before implementation; written approval or acknowledgement of receipt shall not be required.

Changes not meeting that do not satisfy all the requirements in the immediately preceding paragraph shall require prior written approval under this condition, following the consultation procedure above. All safety measures necessary for the revised arrangements shall be implemented before those arrangements commence and shall thereafter remain effective and be retained and maintained.

Changes to managed Service User transport arrangements that do not alter access use or vehicle routing shall not require a separate submission or approval under this

condition. Where a change requires approval under both this condition and Condition 16, a single coordinated submission may address both requirements, with determination under this condition confined to access, routing and associated highway-safety matters. Any consequential Travel Plan update shall be undertaken under Condition 25 without duplicate approval of those matters. Approval or flexibility under one condition does not dispense with any requirement applicable under another.

This condition does not prevent construction use of existing accesses in accordance with the Construction Traffic Management Plan approved under Condition 7, provided that all safety measures required for that construction use have been implemented before it commences. For the purposes of this condition, operational use means access movements serving the accommodation of Service Users and associated operational activities, rather than movements solely for construction, fitting out, testing, commissioning, maintenance or pre-occupation security.

Approval under this condition does not remove any requirement to obtain separate highway consents, agreements or other authorisations before undertaking the works or activities to which they relate.

Reason: To secure safe and suitable access to the development, define and control the respective roles of the northern and southern accesses, ensure that any necessary access and highway improvements are implemented before occupation, and protect highway and pedestrian safety on the B4011.

25. Emergency Access

No phase of the development shall be occupied until an Emergency Access Strategy for that phase has been prepared by a competent authority appointed by the Secretary of State for the Home Department and submitted to and endorsed in writing by the Secretary of State for Housing, Communities and Local Government. The strategy shall include details of:

a) emergency access routes and fire appliance circulation within the relevant phase;
b) emergency vehicle hardstanding, turning and access arrangements;
c) arrangements for emergency access through security controls, gates, barriers or controlled access points;

The strategy shall be consistent with the Highway Safety and Access Scheme approved under Condition 22, including the approved access geometry, gate-management arrangements and internal circulation. A coordinated submission may address both conditions, provided that it clearly identifies the requirements addressed under each. Endorsement under this condition shall not authorise any departure from the scheme approved under Condition 22.

The endorsed strategy shall be implemented before occupation of the relevant phase and maintained for the duration of the development

Reason: To secure and maintain safe and suitable emergency vehicle access, circulation and manoeuvring arrangements, including access through security controls, in the interests of public safety, and effective emergency response.

26. Wastewater Treatment Works Odour, Noise and Operational Management

This condition applies only where an on-site wastewater treatment works is proposed as part of the foul-drainage arrangements approved under Condition 10. Where foul drainage is provided entirely by another means approved under that condition, no submission or approval is required under this condition.

No on-site wastewater treatment works shall be brought into operation until an Odour, Noise and Operational Management Plan for that treatment works has been submitted to and approved in writing by the Secretary of State for Housing, Communities & Local Government. The plan shall be consistent with the foul-drainage strategy approved under Condition 10 and shall include:

a) details of the location, layout and process design of the treatment works sufficient to inform the assessments and controls required under this condition;
b) an odour impact assessment, addressing accommodation units, welfare buildings, neighbouring land uses and off-site receptors, together with necessary odour control measures;
c) a noise assessment covering plant, pumps, blowers, generators, ventilation equipment, alarms and associated wastewater treatment infrastructure, including cumulative effects with other relevant operational noise sources, details of noise mitigation and operational controls;
d) sludge storage, handling and removal arrangements including measures to control associated noise, odour, spills and pollution;
e) chemical storage, bunding and dosing arrangements, where relevant;
f) plant specific emergency procedures, standby power arrangements and responses to equipment or process failure, coordinated with the system wide contingency arrangements approved under Condition 10;
g) monitoring, inspection, maintenance, incident response and complaint-response procedures, identifying responsibility for implementing the approved measures;
h) an implementation and verification programme identifying the measures required before the treatment works is brought into operation; and
i) arrangements for decommissioning or removal when the treatment works are no longer required, consistent with the reinstatement plan required under Condition 3.

All measures identified as prerequisites to operation shall be implemented before the treatment works is brought into operation. The treatment works shall thereafter be operated, monitored and maintained in accordance with the approved plan, and decommissioned or removed in accordance with the approved arrangements.
The detailed assessment and approval of treatment-works noise, odour, sludge handling and plant-specific operational controls shall be undertaken under this condition. Condition 10 shall govern the overall foul-drainage solution, treatment capacity, effluent quality, discharge arrangements, receiving-environment effects and system-wide contingency measures. A coordinated technical submission may support both conditions, provided it clearly identifies the matters submitted for approval under each.

Approval under this condition does not remove or vary the requirements of Condition 10 or any requirement to obtain and comply with a separate environmental permit or other authorisation.

Reason: To protect the amenity of site occupants and neighbouring receptors and prevent unacceptable odour, noise, pollution or operational effects from any on-site wastewater treatment works, while avoiding duplication with the overall foul-drainage requirements secured under Condition 10.

27. Travel Plan

No phase of the development shall be occupied until a Travel Plan for that phase has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The Travel Plan shall be based on the submitted Travel Plan, Site A, Bicester, Final Rev 02, dated 05/06/2026, and shall include:

- **a)** appointment and contact details of a Travel Plan Coordinator;
- **b)** measures to reduce single-occupancy car journeys by staff and visitors;
- **c)** measures to promote bus use, car sharing, cycling and other sustainable travel options where feasible;
- **d)** details of staff and visitor travel information to be provided before and during occupation;
- **e)** details of cycle parking, lockers, changing and shower facilities;
- **f)** confirmation that the Travel Plan is consistent with the managed Service User transport mitigation outcomes secured under Condition 16, and details of how staff and visitor travel planning will be coordinated with those transport measures, without separately fixing Service User transport routes, destinations, frequencies, operating hours or vehicle types;
- **g)** arrangements for a staff and visitor travel survey within six months of first occupation;
- **h)** arrangements for further staff and visitor travel surveys one year, three years and five years after the first survey;

i) the methodology, monitoring indicators, criteria and timetable for establishing reasonable, measurable and evidence-based modal split targets, including targets for reducing single-occupancy motorised journeys where justified by the evidence. Targets shall be informed by a representative post-occupation baseline established through the first staff and visitor travel surveys, taking account of staffing and shift patterns, visitor travel needs, public transport availability and realistic opportunities for modal change, and shall specify timescales for achievement. The targets and supporting assessment shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government, following consultation with Oxfordshire County Council, in accordance with the timetable approved in the pre-occupation Travel Plan. The sustainable-travel measures shall apply from first occupation irrespective of the subsequent approval of targets;

j) arrangements for submitting monitoring reports to Oxfordshire County Council within three months of each survey being completed;

k) a framework of remedial measures, with defined triggers, responsibilities and implementation timescales, to be implemented without further approval or consultation where monitoring identifies that approved targets are not being achieved. The framework shall:

- **I.** include a procedure and timetable for submitting any additional measures requiring approval to the Secretary of State for Housing, Communities and Local Government for approval in writing, together with an implementation programme.
- **II.** provide for Oxfordshire County Council to receive the submission and supporting information and to be invited to comment within 21 days of receipt. The Secretary of State may determine the submission following receipt of the Council's response or expiry of that period, whichever occurs first, taking account of any representations received before determination. Receipt of a response or agreement from the Council shall not be a prerequisite to determination. Consultation on, or approval of, additional measures shall not delay implementation of remedial measures already approved; and

l) arrangements for review and update of the Travel Plan during the lifetime of the development.

Changes to managed Service User transport routes, destinations, frequencies, operating hours or vehicle types shall be governed by Condition 16 and, where access use or vehicle routing is affected, Condition 22. No separate approval of those changes shall be required under this condition. Changes made in accordance with those conditions shall be recorded in the next Travel Plan update undertaken in accordance with the approved review arrangements; that update shall not be a prerequisite to their implementation.

Changes requiring approval under Condition 16 shall be determined under that condition and shall not require duplicate approval under this condition. Any

consequential Travel Plan update shall record the approved changes and identify any implications for staff and visitor travel planning. Any separate changes to staff or visitor mitigation requiring approval under the Travel Plan's approved review arrangements shall remain subject to those arrangements. Changes affecting access use or vehicle routing shall also comply with Condition 22.

The targets and supporting assessment shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government in accordance with the timetable approved in the pre-occupation Travel Plan. Oxfordshire County Council shall be provided with the submission and supporting information and invited to comment within 21 days of receipt. Following receipt of its response, or expiry of that period if no response has been received, the Secretary of State may determine the submission on the available evidence, taking account of any representations received before determination. Receipt of a response or agreement from Oxfordshire County Council shall not be a prerequisite to determination. The absence of a response shall not constitute approval or evidence that the proposed targets are acceptable.

The approved Travel Plan shall be implemented from first occupation of the relevant phase and shall thereafter be monitored, reviewed and updated in accordance with the approved arrangements, subject to the managed Service User transport flexibility expressly provided above.

Reason: To reduce reliance on single-occupancy car travel, encourage sustainable travel by staff and visitors, coordinate travel planning with the managed Service User transport mitigation secured under Condition 16, manage the transport impacts of the development, and ensure that the mitigation identified in the submitted Travel Plan is implemented, monitored and reviewed without unnecessarily fixing detailed operational transport arrangements.

28. Phasing and Submission of Details

No development shall commence until a site-wide phasing plan has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The plan shall identify the boundaries of each phase, the buildings, works, infrastructure and facilities forming part of each phase, the intended sequence of development and occupation, and any shared infrastructure or mitigation required to serve more than one phase. Submissions under the other conditions of this permission shall identify the phase or phases to which they relate and any dependencies on infrastructure or mitigation elsewhere on the site. The development shall be carried out in accordance with the approved phasing plan. Any revised phasing plan shall be submitted to and approved in writing before the development affected by that revision proceeds. Approval under this condition shall not defer or vary any requirement imposed by another condition of this permission.



Reason: To define the phases of development and coordinate the submission and implementation of phase-specific and shared infrastructure and mitigation.

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Annex L

Definitions

"Secretary of State" means the Secretary of State for Housing, Communities and Local Government, unless expressly stated otherwise.

"Service User" means a person provided with non-detained residential accommodation at the site by or on behalf of the Secretary of State for the Home Department pursuant to this permission. It does not include staff, contractors or visitors.

"Phase" means a separately identified part of the development shown on the phasing plan approved under Condition 26, including the buildings, works, infrastructure and facilities identified as forming part of that phase.

"Occupation" means use of the development, or the relevant phase, for the accommodation of Service Users, including use of associated facilities by those Service Users. It excludes access solely for construction, fitting out, testing, commissioning, maintenance or security purposes before Service Users are accommodated. "Occupied" shall be construed accordingly, and "first occupation" means the first occurrence of such use.

"Construction" includes installation, provision, operation, maintenance, improvement or alteration, decommissioning or removal (demolition), or any other building or engineering operations.

"Preliminary work" means environmental surveys and monitoring, ecological habitat creation, and measures for species relocation; surveys of existing infrastructure; investigations for the purpose of assessing or monitoring ground conditions and levels, vegetation clearance.

Ministry of Housing, Communities & Local Government

Annex M

LIST OF ABBREVIATIONS USED IN THIS REPORT

AIA	Arboricultural Impact Assessment
AMS	Arboricultural Method Statement
CA	Conservation Area
CCP	Code of Construction Practice
CCTV	Closed-Circuit Television
CE	Circular economy
CEMP	Construction Environmental Management Plan
EA	Environment Agency
EIA	Environmental Impact Assessment
EPUK	Environmental Protection UK
EQIA	Equality Impact Assessment
FRA	Flood Risk Assessment
GIA	Gross Internal Area
GPDO	Town and Country Planning (General Permitted Development) (England) Order 2015
HE	Historic England
HGV	Heavy Goods Vehicle
HO	Home Office
HRA	Habitats Regulations Assessment
HSE	Health and Safety Executive
IAQM	Institute of Air Quality Management
LB&CA Act	Listed Buildings and Conservation Areas Act
MOD	Ministry of Defence
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
LPD	London Plan Document
MHCLG	Ministry of Housing Communities and Local Government
NE	Natural England
NH	National Highways
NHS	National Health Service
NPPF	National Planning Policy Framework
NDHA	Non-designated heritage asset
OCC	Oxfordshire County Council
PEA	Preliminary Ecological Appraisal

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P&CP Act	Planning and Compulsory Purchase Act 2004
PFAS	Per- and Polyfluoroalkyl Substances
PINS	Planning Inspectorate
PPC	Piddington Parish Council
PPG	Planning Practice Guidance
PSED	Public Sector Equality Duty
RIBA	Royal Institute of British Architects
s106	Section 106 of the T&CP Act
SoS	Secretary of State for Housing, Communications and Local Government
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SuDS	Sustainable Drainage Systems
SSSI	Site of Special Scientific Interest
SSHCLG	Secretary of State for Housing, Communities and Local Government
SSHD	Secretary of State for the Home Department
TA	Transport Assessment
TCP	Tree Constraints Plan
TCPA	Town and Country Planning Act (1990)
TP	Travel Plan
TPO	Tree Preservation Order
TS	Tree Survey
UXO	Unexploded Ordnance
WSI	Written Scheme of Investigation