From: [redacted]
To: Crown Casework
Cc: [redacted]
Subject: URGENT CROWN DEVELOPMENT - CONSULTATION REQUEST - [redacted]
Date: 07 September 2026 15:44:12
Attachments: [redacted]

Dear [redacted]

Thank you for your letter dated 7th September to the Land Use Planning advice team of the Health and Safety Executive (HSE) requesting comments on the planning application for a temporary change of use of the MOD Bicester A site for the phased provision of non-detained asylum accommodation (application no: PCU/RARE/C3105/3378843).

The role of HSE's Land Use Planning advice team is to provide statutory advice on planning applications for developments which will be in the consultation zones of existing sites with consent to hold hazardous substances or in the consultation zones of a major accident hazard pipeline, and which will result in a material increase in the number of people at the location.

In the case of planning application PCU/RARE/C3105/3378843, the proposed development site at Launton Road, Piddington is not in the consultation zones of any sites with hazardous substances consent or major accident hazard pipelines.

Therefore there is no need to consult HSE's Land Use Planning advice team on this application, and we have no comments to make.

We hope that this takes the assessment of the planning application forward.

Yours sincerely

[redacted] | **Land Use Planning advice team**
Health and Safety Executive | CEMHD 5B
[redacted]

PROTECTING PEOPLE
HSE AND PLACES

From: Crown Casework <crowncasework@communities.gov.uk>
Sent: 07 September 2026 09:47
To: [redacted]
Cc: [redacted]
Subject: URGENT CROWN DEVELOPMENT - CONSULTATION REQUEST
Importance: High

OFFICIAL

Dear Sir/Madam,

Please see attached a formal request of consultation regarding an Urgent Crown Development.

Your representation is required no later than 23:59pm on Thursday 17th September 2026.

[redacted]

[redacted]

Ministry of Housing, Communities & Local Government

[redacted]
Planning Casework Manager
Planning Casework Unit | Chief Planner Directorate
Ministry of Housing, Communities & Local Government
7 & 8 Wellington Place, Leeds, LS1 4AP
gov.uk/mhclg | @mhclg

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Os nad chi yw'r derbynnydd bwriadedig, mae unrhyw ddatgeliad, copïo, dosbarthu neu unrhyw gamau eraill a gymerir gan ddefnyddio'r wybodaeth sydd yn yr e-bost hwn wedi'u gwahardd yn llym. Rhowch wybod i'r anfonwr am y gwall fel y gellir dilyn gweithdrefnau mewnol, a dileu'r cyfathrebiad o'ch system ar unwaith wedi hynny.

The Coal Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG
T: 01623 637 119 (Planning Enquiries)
E: [redacted]
W: www.gov.uk/coalauthority

For the attention of: [redacted] – Head of Orders & Crown Casework
Planning Casework Unit – Crown Casework Team

[By email: crowncasework@communities.gov.uk]

8th September 2026

Dear [redacted]

Re: PCU/RARE/C3105/3378843 - Application by the Home Office for the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation at MoD Bicester (A-Site), Bicester Garrison, Launton Road, Piddington, OX25 1AE

Thank you for your notification of the 7th September 2026 seeking the views of the Mining Remediation Authority (trading name of the Coal Authority) on the above.

We are a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, we have a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have assessed the application site, as identified by the red line boundary on the Site Location Plan (Drawing Number BIC-DR_AR-100105 Rev P01), and can confirm that the site does not lie within the defined coalfield.

On the basis that the site does not fall within an area of past coal mining activity the Planning team have no specific comments to make on this application.

Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely

[redacted] *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority and/or information that has been published. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided.

National Highways Planning Response (NHPR 25-01)
Formal Recommendation to an Application for Planning Permission

From: [redacted] (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
[redacted]

[redacted] Ministry of Housing, Communities & Local Government, FAO: [redacted]

CC: [redacted]

Council's Reference: PCU/RARE/C3105/3378843

Location: Bicester Garrison, Launton Road, Piddington, OX25 1AE

Proposal: Application by the Home Office for the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation.

National Highways Ref: NH/26/17868

Referring to the consultation on a planning application dated 7 September 2026 referenced above, in the vicinity of the M40 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) **offer no objection (see reasons at Annex A**);

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.[1]

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: [redacted] **Date:** 14 September 2026

Name: [redacted] **Position:** Spatial Planner, Area 3

National Highways:
Ground Floor, Building 1000, Cathedral Square, Guildford, GU2 7YL
www.nationalhighways.co.uk

[1] Where relevant, further information will be provided within Annex A.

Annex A National Highways' assessment of the proposed development

National Highways was appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M40 and more particularly, the M40 Junction 9.

National Highways has reviewed the Transport Assessment and Travel Plan available on MHCLG's webpage and has noted the following:

- A lot of the material in the Transport Assessment needed to come to a view concerning the potential impact of the proposed development on the SRN (i.e. concerning trip generation and trip distribution) is redacted. However, Table 5-5 in the Transport Assessment indicates that the proposed development is expected to add about 80 and 20 extra vehicular trips to the B4011 in the AM and PM peak hours. Additions of this magnitude are unlikely to have a significant impact on any SRN junctions given the different directions they will travel from and to and the distance of the nearest SRN junction on the M40 (Junction 9, about 12km away by road).
- The applicant is committed to developing a CTMP, which will be agreed with the relevant bodies (Transport Assessment, paragraph 5.2.7).
- Amongst other things, the Travel Plan is aimed at encouraging the use of alternative modes of transport to the private car and to better manage private car usage to reduce environmental impacts for all journeys to and from the proposed development (Travel Plan, paragraph 1.2.6).

We also noted the following:

- The B1104 (in Cambridgeshire) rather than the B4011 is mistakenly referred to at a number of points in the Transport Assessment (paragraphs 3.6.1, 3.9.2-3.9.5 and 5.4.1-5.4.5 and Table 5-5).
- DfT Circular 01/2022 is not mentioned in the section of the Transport Assessment addressing policy (section 2.0).
- The 2026 Baseline vehicular flows presented in Table 5-5 in the Transport Assessment appear to be average daily 7-day 0700-0800 and 1600-1700 vehicle volumes when compared to the traffic count data in Appendix B. Average daily 5-day weekday flows are significantly higher.

However, having reviewed available information we are satisfied that the proposed development will not have a significant impact on the safe and efficient operation of the SRN.

Standing advice to the local planning authority

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Historic England

Crown Development Casework Unit
Planning Casework Unit
Ministry of Housing, Communities and Local Government
23 Stephenson Street
Birmingham
B2 4BH

15 September 2026

Dear Crownwork Development Casework Unit

T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

MOD BICESTER, (A-SITE), BICESTER GARRISON, LAUNTON ROAD, PIDDINGTON, OX25 1AE
Application No. PCU/RARE/c3105/3378843

Thank you for your letter of 7 September 2026 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you also seek the views of the Local Authority specialist conservation and archaeological advisers.

It is not necessary to consult us on this application again, unless there are material changes to the proposals.

Yours sincerely

[redacted]
Team Leader, Development Advice
E-mail: [redacted]

Date: 15 September 2026
Our ref: 558088
Your ref: PCU/RARE/C3105/3378843

crowncasework@communties.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear [redacted]

Planning consultation: URGENT CROWN DEVELOPMENT Home Office for the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation.
Location: MoD Bicester (A-Site), Bicester Garrison, Launton Road, Piddington, OX25 1AE.

Thank you for your consultation on the above dated 7th September 2026 , which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on **Arncottt Bridge Meadows Site of Special Scientific Interest**. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.
The following information is required:

- Further information as to whether surface water from the Phase 1 northern development area could reach Arncott Bridge Meadows SSSI via the downstream ditch network.
- Clarification on the proposed foul water discharge route and confirmation as to whether there will be any hydrological connection to Arncott Meadows SSSI.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required:

Surface Water Flows

The Drainage Design Statement does not demonstrate the downstream surface water pathways from the site or whether the receiving ditch network is hydraulically connected to Arncott Bridge Meadows SSSI. Whilst attenuation is proposed for the southern phases of development, the Phase 1 development in the northern part of the site, which occupies the lowest-lying area, is proposed to continue draining via the existing collection, conveyance and outfall arrangements because attenuation cannot be accommodated. The report states that this area is assumed to discharge to a watercourse to the north-east of the site, but the drainage routes and outfall locations have not been confirmed and further survey work is required. As a result, the potential effects of the development on the hydrology and water quality of Arncott Bridge Meadows SSSI cannot currently be assessed.

Foul Drainage Arrangements

The foul water strategy remains uncertain, with the applicant identifying a potential worst-case scenario involving a new on-site wastewater treatment works discharging treated effluent to a watercourse. As the discharge location, receiving watercourse and downstream receptors have not been identified, it is not possible to determine whether there is a pathway to Arncott Bridge Meadows SSSI or to assess potential effects on water quality and nutrient loading.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter please contact me on [redacted]

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service.

Please consult us again once the information requested above, has been provided.

Yours sincerely

[redacted]
Sustainable Development Higher Officer
Thames Solent Team

Annex A- Natural England General Advice

Protected Landscapes
Paragraph 189 of the National Planning Policy Framework - GOV.UK (www.gov.uk) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling-up and Regeneration Act 2023 (legislation.gov.uk) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes
Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) - Landscape Institute for further guidance.

Biodiversity duty
Section 40 of the Natural Environment and Rural Communities Act 2006 (legislation.gov.uk) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the Complying with the biodiversity duty - GOV.UK (www.gov.uk) for further information.

Designated nature conservation sites
Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see Habitats regulations assessments: protecting a European site - GOV.UK (www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see Appropriate assessment - GOV.UK (www.gov.uk) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones (England) (arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified (Sites of special scientific interest: public body responsibilities - GOV.UK (www.gov.uk).

Protected Species
Natural England has produced Protected species and development: advice for local planning authorities - GOV.UK (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to Wildlife licences: when you need to apply (www.gov.uk) for more information.

Local sites and priority habitats and species
The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local nature recovery strategies - GOV.UK (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and species of principal importance in England (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitat (Draft) - data.gov.uk (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains
Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Unless exempt major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to minor development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from May 2026.

Biodiversity Net Gain guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the Biodiversity Net Gain Planning Practice Guidance (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric for more information. For minor development sites, The Small Sites Metric may be used where these sites meet the criteria to use this Small Sites Metric. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (naturalengland.org.uk) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural environment - GOV.UK (www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees
The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The Natural England Access to Evidence - Ancient woodlands Map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk). Find open data - data.gov.uk on Agricultural Land Classification or use the information available on MAGIC (defra.gov.uk).

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (publishing.service.gov.uk) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim minerals extraction and landfill sites to agriculture - GOV.UK (www.gov.uk), which
provides guidance on soil protection for site restoration and aftercare. The Soils Guidance (quarrying.org) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure
For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development

should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:
Paragraphs 105, 185, 187 and 193 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to Find your perfect trail, and discover the land of myths and legend - National Trails for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the Natural environment - GOV.UK (www.gov.uk).

[redacted]

From: Crown Casework

Subject: FW: Home Office Proposal at MoD Bicester (A-Site) Clarification of Natural England's Position

OFFICIAL-SENSITIVE

From: [redacted] <[redacted]>
Sent: 23 September 2026 10:28
To: [redacted]
Subject: Home Office Proposal at MoD Bicester (A-Site) – Clarification of Natural England's Position

You don't often get email from [redacted] Learn why this is important

Dear [redacted]

Thank you for your email.

Having reviewed our consultation response alongside the subsequent correspondence between the Home Office and Natural England, I would like to clarify Natural England's position regarding the Home Office application for the temporary change of use of the Defence Storage and Distribution Centre site (MoD Bicester A-Site) in connection with the phased provision of non-detained asylum accommodation at MoD Bicester (A-Site), Bicester.

The concerns raised within Natural England's consultation response are consistent with those identified through discussions between the Home Office and Natural England's Major Planning Casework Team. During those discussions in August 2026, additional information and assurances were provided by the Home Office and, on that basis, a potential way forward was identified in relation to the proposal.

The additional information discussed included the temporary tankering of foul waste in the early stages of the development, together with further detail regarding water quantity and drainage matters. These discussions were intended to address concerns regarding potential impacts on the notified features of Arncott Bridge Meadows SSSI.

It is noted that the application documentation has incorporated the temporary tankering of foul waste as an initial phase arrangement, consistent with the discussions that took place between the Home Office and Natural England's Major Planning Casework Team. However, the submitted Drainage Design Statement also acknowledges that tankering is not considered a viable long-term

solution for the site and identifies a number of potential long-term foul water management options, including connection to the sewer network and the provision of a new on-site wastewater treatment works. The document confirms that further assessment is required before the preferred long-term solution can be confirmed.

In addition, the Drainage Design Statement submitted as part of the application is dated June 2026, predating the discussions between the Home Office and Natural England by approximately two months. Whilst the temporary tankering arrangement has been reflected within the submitted documentation, there remains uncertainty regarding the final long-term foul water management strategy for the site.

Similarly, there remains uncertainty regarding the proposed surface water management arrangements. The submitted drainage strategy is based on a number of assumptions relating to existing drainage infrastructure, discharge routes and outfall arrangements, with further survey work, hydraulic assessment and design development identified as being necessary to confirm the proposed approach.

This uncertainty makes it challenging to fully assess the potential hydrological impacts on Arncott Bridge Meadows SSSI. In particular, Natural England has not seen sufficient information to understand with confidence how the various drainage options may affect the hydrological conditions that support the SSSI, and no additional hydrological assessment has been provided to assess the implications of the different long-term drainage scenarios presented within the application documentation.

Natural England's consultation response therefore remains an accurate reflection of the application documentation before us. Whilst a potential way forward was identified through discussions with the Home Office, we would expect the planning application and supporting documents to clearly set out:

- the proposed long-term foul water solution;
- the proposed long-term surface water management arrangements;
- the water quantity and drainage commitments discussed with Natural England such as confirmation that no additional hardstanding would be created;
- any supporting evidence necessary to demonstrate that the proposed approach would not adversely affect the hydrological conditions supporting Arncott Bridge Meadows SSSI.

In summary, Natural England is not identifying new issues beyond those previously discussed. Rather, we are seeking clarification that the application documentation clearly identifies the final drainage proposals for the site and provides sufficient supporting information to enable the potential hydrological impacts on Arncott Bridge Meadows SSSI to be fully assessed.

I hope this clarifies Natural England's position.

Best wishes

[redacted] - Higher Officer
Sustainable Development
Thames Solent Team
Natural England

Red Kite House
Howbery Park
Crowmarsh Gifford
Wallingford
Oxfordshire
OX10 8BD

My normal working hours are 9am-3pm Monday to Friday
www.gov.uk/natural-england



From: [redacted]
Sent: 22 September 2026 12:08
To: [redacted] <[redacted]> [redacted]
<[redacted]>
Cc: [redacted] <[redacted]
[redacted]
[redacted]-NE-Consultations (NE) <consultations@naturalengland.org.uk>;
Crown Casework <crowncasework@communities.gov.uk>; [redacted]
[redacted]
Subject: URGENT CROWN DEVELOPMENT Home Office for the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation at MoD Bicester (A-Site), Bices
Importance: High

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OFFICIAL-SENSITIVE

Hi both,

Further to my e-mail below please could you give me and update on my request.

Please could you send your response marked ‘Urgent’ to me as soon as possible today. As I mentioned yesterday, if you would like to meet to discuss please let me know by return.

Kind regards,
[redacted]

Ministry of Housing, Communities & Local Government

[redacted]
Head of Crown Casework
Ministry of Housing, Communities & Local Government
Chief Planners Directorate
gov.uk/mhclg | @mhclg

OFFICIAL-SENSITIVE

From: Crown Casework
Sent: 21 September 2026 14:38
To: [redacted] <[redacted]>;
[redacted]<[redacted]k>
Cc: [redacted] 'consultations@naturalengland.org.uk' <consultations@naturalengland.org.uk>; Crown Casework <crowncasework@communities.gov.uk>
Subject: URGENT CROWN DEVELOPMENT Home Office for the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation at MoD Bicester (A-Site), Bices
Importance: High

Hi [redacted]

Thank you for your consultation response.

I understand that the Home Office and the MHCLG EIA Screening Team have been discussing this proposal with your colleague, Mark Turner, who is copied into this email. For ease of reference, I have attached his most recent email to the Home Office, in which he confirms:

"We are happy that this proposal can move forward without damaging the interest features for which Arncott Bridge Meadows SSSI was classified."

In light of this correspondence, and with reference to both your consultation response and Mr Turner's subsequent exchange with the Home Office, I would be grateful if Natural England could provide a revised consultation response clarifying its final position on the proposal.
As this is an urgent case and the consultation period has now concluded, I would appreciate receiving your response by close of business today, if possible. Should it be helpful to discuss this request further, we would be happy to arrange a meeting later this afternoon or first thing tomorrow morning.

Many thanks for your assistance.

Kind regards,
[redacted]

Ministry of Housing, Communities & Local Government

[redacted]
Head of Crown Casework
Ministry of Housing, Communities & Local Government
Chief Planners Directorate
gov.uk/mhclg | @mhclg

From: [redacted]
Sent: 15 September 2026 16:05
To: Crown Casework <crowncasework@communities.gov.uk>
Subject: URGENT CROWN DEVELOPMENT Home Office for the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation at MoD Bicester (A-Site), Bicester

You don't often get email from [redacted] Learn why this is important

Dear [redacted]

Our Ref: 558088
Your Ref: URGENT CROWN DEVELOPMENT Home Office for the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation at MoD Bicester (A-Site), Bicester Garrison, Launton Road, Piddington, OX25 1AE (PCU/RARE/C3105/3378843)

Please find the attached consultation response from the Thames Solent Sustainable Development team at Natural England. We note that you have also had discussions with the Major Planning Casework team within Natural England in relation to this case.

Best wishes

[redacted] - Higher Officer
Sustainable Development
Thames Solent Team
Natural England

Red Kite House
Howbery Park
Crowmarsh Gifford
Wallingford
Oxfordshire
OX10 8BD

My normal working hours are 9am-3pm Monday to Friday
www.gov.uk/natural-england

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COUNTY COUNCIL'S RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL

District: Cherwell
Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Proposal: Full planning permission for the temporary change of use of the former defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation. The Proposed Development comprises the retention and change of use of Building A6, the demolition of existing buildings and structures, the erection of new modular accommodation, and the provision of space for associated health and welfare facilities, site infrastructure, wastewater treatment plant, roads, access ways, security infrastructure, parking, staff accommodation and facilities, and open space and recreational areas, to accommodate up to 1,256 service users.
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Response Date: 17th September 2026

This report sets out the officer views of Oxfordshire County Council (OCC) on the above proposal. These are set out by individual service area/technical discipline and include details of any planning conditions or Informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement. Member views are provided at Annex 1.

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

General Information and Advice

Recommendations for approval contrary to OCC objection:
If within this response an OCC officer has raised an objection, but the Local Planning Authority are still minded recommending approval, OCC would be grateful for notification (via planningconsultations@oxfordshire.gov.uk) as to why material consideration outweighs OCC's objections, and to be given an opportunity to make further representations.

Outline applications and contributions

The anticipated number and type of dwellings and/or the floor space may be set by the developer at the time of application which is used to assess necessary mitigation. If not stated in the application, a policy compliant mix will be used. The number and type of dwellings used when assessing S106 planning obligations is set out on the first page of this response.

In the case of outline applications, once the unit mix/floor space is confirmed by reserved matters approval/discharge of condition a matrix (if appropriate) will be applied to establish any increase in contributions payable. A further increase in contributions may result if there is a reserved matters approval changing the unit mix/floor space.

Where a S106/Planning Obligation is required:

- **Index Linked** – in order to maintain the real value of S106 contributions, contributions will be index linked. Base values and the index to be applied are set out in the Schedules to this response.

- **Administration and Monitoring Fee**

A fee to cover the cost of monitoring and administration associated with the S106 agreement will be secured in the S106 agreement. The fees for the period 1st April 2025 to 31st March 2026 are set out below. The fees are revised annually and approved by Cabinet.

Aggregate of contributions secured in S106	Up to £10K	Up to £25K	£25,001 - £50K	£50,001 - £150K	£150,001 - £500K	£500,001 - £1m	£1,000,001 - £2m	Over £2m
Admin and Monitoring Fee	£158	£390	£765	£2,310	£5,680	£7,675	0.945%of aggregate of contribution amount	£18,900 + 0.1% of any amount over £2m

- **OCC Legal Fees** The applicant will be required to pay OCC's legal fees in relation to legal agreements. Please note the fees apply whether a S106 agreement is completed or not.

Security of payment for deferred contributions - Applicants should be aware that an approved bond will be required to secure a payment where a S106 contribution is to be paid post implementation and

- the contribution amounts to 25% or more (including anticipated indexation) of the cost of the project it is towards and that project cost £7.5m or more
- the developer is direct delivering an item of infrastructure costing £7.5m or more
- where aggregate contributions towards bus services exceeds £1m (including anticipated indexation).

A bond will also be required where a developer is direct delivering an item of infrastructure.
The County Infrastructure Funding Team can provide the full policy and advice, on request.

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Transport Schedule

Recommendation: Objection for the following reasons:

- The Transport Assessment (TA) and supporting documentation do not provide sufficient evidence or detail to demonstrate that safe and suitable access to the proposed facility can be achieved. Given the scale, isolated location and non-detained nature of the proposed use, the highway authority considers that the following matters require further assessment and clarification before the proposal can be supported:
    1. Visibility splays should be reassessed and justified in accordance with relevant design standards.
    2. The proposed vehicular access arrangement requires improvement to demonstrate safe operation.
    3. The site lacks safe and suitable pedestrian access from the surrounding area for employees and residents, and no improvements are currently proposed.
- The distribution of development traffic on the highway network requires further review and justification.

If the Local Planning Authority is minded to approve this development proposal the following Section 06 agreement obligations, including the requirement to enter into a s278 agreement to mitigate the impact of the development and planning conditions are detailed in this response.

S106 Contributions

Contribution	**Amount £**	**Price base**	**Index**	**Towards** (details)
Traffic Reg Order	4,750	April 2026	RPI-x	TRO consultation for speed limit amendment
Travel Plan Monitoring	3,430	April 2026	RPI-x	Monitoring the Travel Plan for a period of 5 years.
Total	**8,180**			

Key points

- Policy consideration needs to be updated to reflect the August 2026 National Planning Policy Framework (NPPF), including the requirement for safe and suitable access, sustainable transport connectivity and the consideration of reasonable future movement scenarios.
- The personal injury collision study area must be extended beyond the immediate site access to include the section of the B4011 between Patrick Haugh Road and the A41, together with any other local corridors materially affected by development traffic.
- It is unclear what, if any, improvements are proposed to the northern access, which does require improvement as set out below.

- The site lacks safe and continuous pedestrian and cycle access from the surrounding area for employees, residents and visitors, including to nearby villages, bus stops and local recreation facilities.
- Traffic from the facility has not been realistically distributed onto the network. Assumptions behind this should assist in understanding the basis of this pattern.
- The applicant must clarify whether any existing routeing agreement or operational routeing arrangement applies to the site and explain how construction, servicing, shuttle-bus, staff and visitor traffic would be managed to avoid inappropriate routing through nearby villages.

Comments:

1.0. Introduction

1.1. The application proposes the installation of temporary modular units and the repurposing of some existing buildings to provide living accommodation, supporting amenities and infrastructure for up to 1,256 non-detained single adult males. The proposal is for temporary use, initially for a period of ten years (facilities are being designed to operate for longer in case use beyond ten years is required) and once operations conclude the site will be decommissioned.

2.0. Policy

2.1. In line with National Policy requirements, the development proposals are required to demonstrate how they have adequately met the policies relevant to this site.

2.2. Since the TA was submitted, an updated NPPF has been published and any reference hereby made to the previous version should be superseded. In light of the updated Framework, I wish to highlight some of the relevant policies:

- *Policy TR3*: Locating development in sustainable locations: Paragraph 2 states that the DfT Connectivity Tool should be used alongside other relevant quantitative or qualitative evidence in assessing the connectivity of particular locations proposed for development. There does not appear to be any reference made to this tool in this application.

- *Policy TR6:* Paragraph 3 states that 'in assessing movement patterns and potential impacts … reasonable future scenarios should be considered, taking into account impacts at relevant times of day, potential cumulative impacts, multimodal trip generation … 'As seen in the assessment, there has not been any reasonable future scenarios, which include the scenario that the modal share may take the form that hasn't otherwise been envisaged here.

3.0. Access arrangements

3.1. Located adjacent along the eastern side of the B4011, the site is an unsustainable location, located 5km from Bicester with Arncott and Piddington being the nearest villages about 1.3km and 1.6km respectively. The site is

currently served by two accesses approximately 500m apart along the eastern side of the B4011. The northern entrance has not been in active use but shall be used as the primary access for the proposed development.

3.2. Paragraphs 4.3.1 and 4.3.2 suggest that northern access junction shall remain as it is and also asserts that the current access arrangements operate satisfactorily with no known conflicts. Whilst there may not be any known conflicts with respect to the site access, I do have strong reservations with the current northern access serving as the primary access without changes to the layout.

3.3. Elsewhere, the TA under para 4.7.1 states, 'Service and emergency vehicles will gain access to the development via the improved northern site access off the B4011'. The applicant should make it clear what improvements are being referred to here.

3.4. Although the northern access is existing, it has not been used for a considerable period and the proposed development would substantially intensify its use. It is therefore reasonable to re-assess whether the access can safely accommodate the associated traffic, including staff arrivals at shift changeover, minibuses and coaches, emergency vehicles, and service and delivery vehicles. Given the expected staffing levels, there is potential for several staff vehicles to arrive shortly before shift changes, creating a short queue of vehicles waiting to enter the site. Although a swept path analysis has been undertake to demonstrate the ability of a number of vehicles to safely manoeuvre in and out of the site, I strongly suggest that the application should consider the following as additional measures that should improve safety at the access;

- Assessment of the requirement of a holding lane to allow drivers to reduce speed before making a turn without holding up vehicles behind them on the fast B4011. Introduction of a lower speed zone with appropriate signage and measures on the approach to the northern site.

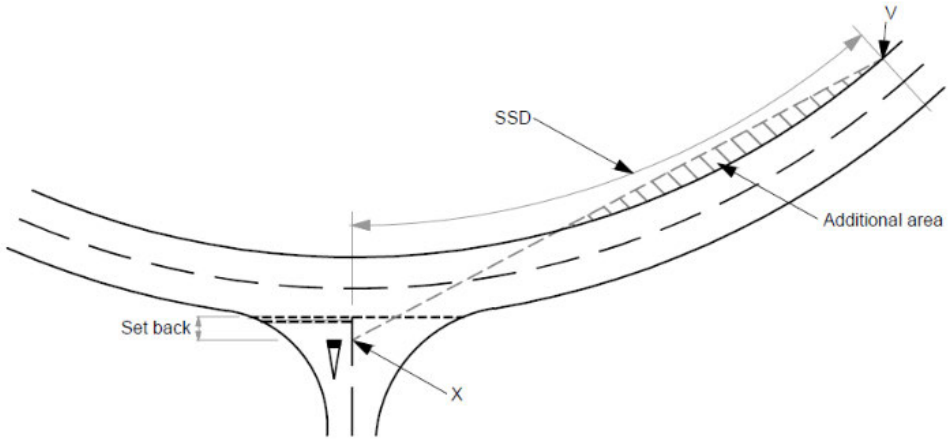
- An obligation towards meeting the administering of the TRO to lower the speeds either end of the site shall be required.

3.5. The need for these improvements is further demonstrated by the swept path analysis, which shows HGVs and coaches tracking into the opposing traffic lane. This presents a potential safety concern given the speed and nature of traffic on the B4011 in the vicinity of the site.

3.6. Clarification and details of the emergency access are required to be provided to demonstrate how this will be limited to emergency vehicles only.

3.7. While I am satisfied that visibility to the left is likely to be achievable, as shown in Image 4-1 of the TA, I have concerns regarding visibility to the right. The drawing shows that the right-hand visibility is significantly offset, requiring an additional area of visibility on the highway verge. The stopping sight distance in this case should have been taken as illustrated in the snippet below.

Figure 3.10 Additional area of visibility on the inside of a curved major road



TE 1 The additional area of visibility on the inside of the curve (as illustrated in Figure 3.10) applies to both the left and right of a priority junction/direct access.

3.8. I therefore do not agree with the TA's assertion that 215m visibility to the right is practically achievable, particularly as this is the critical direction from which the majority of trips are expected to arrive from, and depart towards, Bicester.

3.9. Columns of street lighting are observed within the access envelope of the southern access. These extend to the south along B4011 and into Patrick Haugh Road. The last column is noted to be about 50m south of the B4011 junction with Patrick Haugh Road junction.

3.10. The TA suggests that, in the absence of pedestrian infrastructure serving the site, residents would access facilities in the surrounding area via minibuses to be provided by the Home Office. The level, frequency, operating hours, destinations, capacity and booking arrangements for this service are not specified. As residents would not be detained, it is reasonable to assume that they may wish to make independent journeys off site, including to nearby villages, shops, bus stops, recreation facilities and wider services. In the absence of safe walking routes, there is a foreseeable risk that pedestrians may walk in the carriageway on roads with no footway, no lighting and unrestricted or higher speed limits. The applicant must therefore provide a quantified assessment of likely pedestrian movements and demonstrate how these movements would be safely accommodated or otherwise managed.

3.11. Public bus services are available at Bullingdon Prison, but there is no formal crossing point of the B4011, and the footpath at the southern site access junction to where people would want to cross, is inadequate. Given the speed and volume of traffic on the B4011, the lack of pedestrian facilities is considered to pose an unacceptable safety risk to residents, employees and other road users.

3.12. There is no existing cycle infrastructure within the vicinity of the site along the B4011, which is a single-carriageway road subject to a 50mph speed limit. The applicant should clarify whether cycle parking and related facilities are intended for staff, residents or both, and demonstrate how cycling would be promoted

only where it can be undertaken safely by users who may be unfamiliar with local roads and UK highway rules.

4.0. Sustainable transport connectivity/transport sustainability

4.1. I have visited the DfT's Connectivity Tool to understand how well this site is connected to everyday destinations by sustainable modes of transport. This has produced a score between 17-19 even without considering the quality of the existing infrastructure which has already been noted to be sub-optimal or inexistent.

4.2. Oxfordshire County Councils 'Local Transport and Connectivity Plan' sets out to achieve reduced private vehicle journeys whilst further promoting safe active travel journeys such as walking, cycling and use of public and shared transport services. In addition, it is paramount that facilities for vulnerable road users should be taken into account as part of any future design or infrastructure improvements.

4.3. The TA identifies a local amenity, the MOD Bicester Garrison Sports Pitches, approximately 300m north of the existing site access along the B4011. This is likely to be attractive as a recreational option for many residents, for example for informal football. The pitches are also noted to be on the opposite side of the carriageway where no walking or crossing provisions have been availed. In the absence of pedestrian provision between the site and the sports pitches, residents are likely to be exposed to highway safety risks, as they would need to walk along the B4011, including potentially when returning to their accommodation at dusk.

4.4. The TA suggests that a number of amenities shall be provided on site including health services in an attempt to contain external related trips by residents. Shuttle buses/ mini-bus services will be availed for occasions where residents are required to travel to key external amenities or necessary trips. The application however has not identified these key amenities or trips. It is my assumption that Bicester shall serve as the key destination where on-ward travel by other modes to the rest of UK can be accessed.

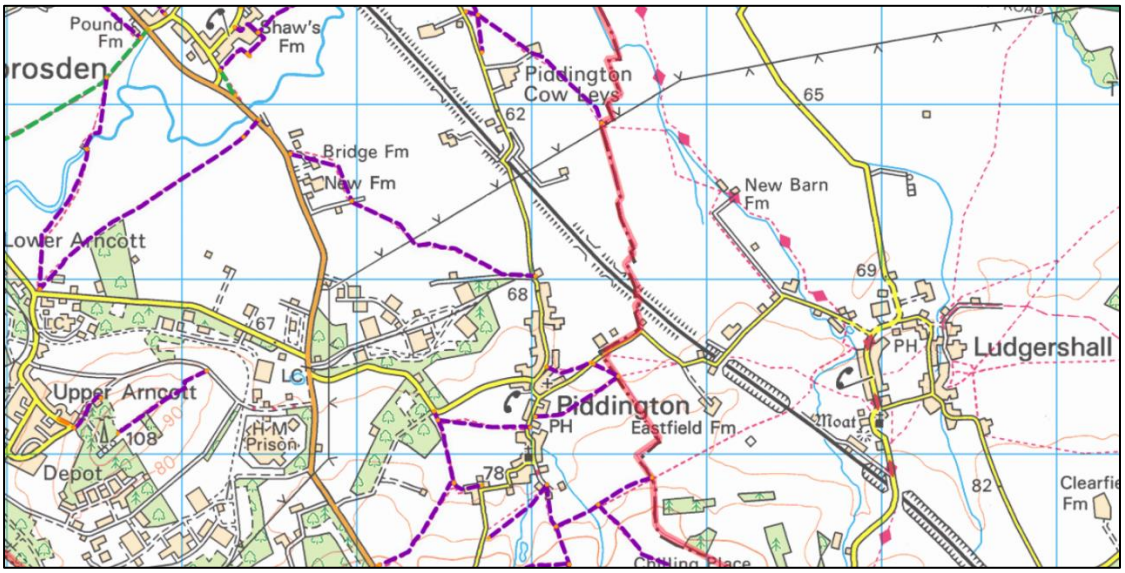
4.5. Public Transport - The information available is limited. Contrary to the information presented in the TA, the nearest bus stop to the site (at HMP Bullingdon) is 550m from the southern access point, not 400m as stated. Footpath improvements would be needed as this is currently narrow at some points.

4.6. The applicant has proposed a shuttle bus service for residents of the site. This provision is agreed subject to the timetable, route and destinations being discussed with the County Council in advance for information purposes. However, it must be acknowledged that this would not remove the demand for residents to leave the site on foot.

4.7. It is unlikely that staff working on shift would find public transport convenient for journeys to work although it remains questionable whether their vehicular trips would add to congestion because they would be off peak.

5.0. Public rights of way

5.1. There is a nearby PRoW but nothing directly affected by the development. It is acknowledged that the unit is non-detention, and it is assumed that the fencing/security is for the users' wellbeing. If that is the case it is recommended that external fencing near to the PRoW is upgraded to prevent unwanted access to and from the footpath.



5.2. Regarding the users / occupiers of the proposed site, it is recommended a fitness jogging, and outside workout circuit is included in the site layout if the Local Planning Authority is minded to permit this planning application.

6.0. Site Layout and Parking

6.1. The Planning Statement (para 7.5) also states, 'The proposed development is unique in character and operation. In determining an appropriate level of on-site car parking the Transport Statement (Section 4.6 on page 30) has determined the Oxfordshire County Council standard for land use F1 'Non-residential institutions' to be most appropriate standard for the proposed development'. I seek further rationale in choosing this criterion noting that this facility is broadly residential in nature.

6.2. The development will provide up to 147 on-site car parking spaces for staff and visitors which I understand to be a derivative of parking accumulation calculated to allow the maximum number of staff and visitors expected on site at any one time, including overlap for shift changes. While this level of provision could be seen as encouraging private car use over more sustainable modes, it is considered reasonable given the nature of the proposed development and its location.

6.3. However, clarification is required for Parking Accumulation at Table 4-2 Appendix D as it does not contain visitor parking while paragraphs 5.3.18 to 5.3.19 of the TA account for at least one visitor per hour between 0900hrs and 1700hrs.

7.0. Impact Analysis

7.1. *Personal Injury Accidents* – The collision study area is limited to less than 200m from the site access. I consider this to be disproportionate to the scale of the development and insufficiently focused on the roads and junctions most likely to be affected by development traffic. In this instance, the assessment should extend to include the section of the B4011 between Patrick Haugh Road and the A41.

7.2. While it is acknowledged that there is no evident pattern of collisions indicating inherent safety issues on the local highway network, and that the proposed development is not expected to materially worsen road safety, the intensified use of the B4011 by development traffic is likely to increase the potential for accidents.

7.3. The collision assessment should include the full STATS19 record for the relevant B4011 corridor and should not be confined to the immediate site frontage. This is necessary to understand whether the proposed intensification of movements, including pedestrian and shuttle-bus activity, could materially affect existing highway safety patterns or introduce new conflict risks.

7.4. *Trip Generation* – the applicant and data obtained from RAF Wethersfield for which this has been applied to this site in order to estimate the proposed trips on a first-principles basis.

7.5. Based on the information provided in the TA regarding the RAF Wethersfield facility, I consider the two sites to be reasonably comparable. Given the similarities between the RAF Wethersfield facility and the proposed use at the Bicester site, I agree that it is reasonable to assume that the trip generation characteristics are likely to be similar and can therefore be relied upon with sufficient confidence.

7.6. *Trip Distribution* – The TA distributes the surveyed trips across the network, as set out in Table 6-1. This indicates that, in the AM peak, 77.4% of movements are southbound and 22.6% northbound, while in the PM peak the split is 67.5% northbound and 32.5% southbound. I understand these figures to reflect the surveyed tidal flow on the B4011. However, in the application of this information in the Traffic Flow Diagrams the TA shows that a significant proportion of flows from the facility would head to the south. I find this unrealistic given the facility's location within the wider catchment. I would expect most staff to arrive from the north (Bicester) during the AM peak and to depart in the same direction rather than continue as the B4011 tidal flows have captured. This anomaly must be adjusted.

7.7. Clarification is required with the bullet points under paragraph 5.3.20 which suggest that shifts on site are split into two 12-hour shifts: 0700-1900 and 1900-

0700hrs yet in a separate bullet point, the Day Shift is shown to be between 0800-1800hrs.

7.8. Notwithstanding the trip distribution anomaly, the arrival and departure profiles seem reasonable for both staff, residents as well as their visitors. This forecasts up to 79 and 21 two-way vehicular trips in the AM and PM peak hours respectively. This volume is considered robust from this development (in terms of nature, scale and location).

7.9. The resultant assessment in percentage increase in traffic has led the applicant to only consider the access junction on the basis that it appears to be the only junction whose percentage increase in traffic flows albeit insignificantly.

7.10. An assessment of the traffic capacity of the site access junction demonstrates that the junction will operate with plenty of spare capacity in 2027 and 2031, inclusive of background traffic growth and the addition of the proposed development traffic.

7.11. My conclusion from this comparative exercise is that the 1,256 residents to be accommodated does not correlate to a daily need for travel throughout their 90 days on the facility. And their movements are proposed to greatly be managed through a shuttle service. It is hence likely to be the occasional residents that would fall through the forecasted trip generation/ patterns to result in 64 two-way daily trips attributed to residents alone.

7.12. Given that the proposed facility would employ 130 staff working on a shift pattern to manage the site 24 hours a day, I agree with the employee trips assumed in Table 5-3, show that up to 55 trips (and this is assuming each employee drives) separately in the AM peak hour.

7.13. In addition, in order to have confidence that the correct methodology for Decide and Provide has been applied, the applicant is required to complete and submit the methodology checklist contained within appendix 3 of the 'Implementing 'Decide and Provide' – requirement for Transport Assessment' document.

8.0. Travel Plan

8.1. The Travel Plan submitted as part of this application has been assessed against the criteria contained within appendix 5 of the OCC guidance document 'Transport Assessments and Travel Plans March 2014'. Outlined below is the information required for the document to meet OCC criteria.

8.2.

- What is the estimated date of occupation?
- Clarification of 'visitors' – in addition to visiting professionals, will there be circumstances when site users will have UK based family members visiting?
- Information about the number of deliveries per week is required (for example to stock the on-site shop, refuse lorries etc).

- Are there any known or perceived barriers to the promotion of sustainable, active travel (for example – bus stop proximity, lack of footpaths, language barriers of residents etc).
- Reducing the need to travel has not been discussed. How will the site support this – for example virtual meetings for both staff and residents. Food deliveries?
- Are EV charging facilities to be provided on site? If so, how many? Will these be free to use?
- Interim Travel Plan Co-ordinator details are required. This is useful information for the Travel Plans Team to enable a monitoring related dialogue to begin as soon as possible.
- Budget information is required. What budget is to be allocated, not just to cover the cost of the TPC role, but also for costs associated with the actions identified within the action plan and the 5-year monitoring process.

- Could the shuttle bus be used for staff travel too?
- Are there to be any pool vehicles on site that could be used by staff needing to access other sites during the day.
- Taxi use has not been discussed.
- Census data has been used to provide indicative targets but are there other sites across the country that could be approached for more 'like for like' data. This would be more useful in target setting.
- Table 7.2 shows a reduction in car use by 8% but an increase in other modes by only 7%, please can this be considered.
- Targets are required for the baseline year and then for years 1, 3 and 5.
- Paragraphs 7.32/ 7.33 – A baseline survey should be undertaken within 3 months of occupation.
- A commitment is required that if targets are not met monitoring will continue in years 7 and 9.

Action plan - additional ideas
- Collaboration with local Taxi companies.
- Reducing the need to travel (virtual meetings etc).
- Consolidation of deliveries where possible or using sustainable delivery companies such as those with electric vehicle fleets.
- Use of shuttle bus for collections at transport hubs for staff, separate to journeys for site users.
- Provision of shower and changing facilities for staff.
- Cycle repair equipment kept at a central location on site or provision of a cycle maintenance station.

9.0. Planning Conditions

9.1. In the event that permission is to be given, the following planning conditions should be attached:

Site Access: Full Details

Prior to the commencement of the development hereby approved, full details of the means of access between the land and the B4011 including position, layout, drainage, lighting, visibility splays and footways shall be submitted to and

approved in writing by the Local Planning Authority. There shall be no obstruction of the visibility splays above 0.6m high. Thereafter and prior to the first occupation of any of the development, the means of access shall be constructed and retained in accordance with the approved details.

Reason - In the interests of highway safety and to comply with Government guidance contained within the National Planning Policy Framework

Construction traffic management plan

Prior to commencement of the development hereby approved, a Construction Traffic Management Plan (CTMP) shall be submitted to and approved in writing by the Local Planning Authority. The CTMP shall include construction access arrangements, construction vehicle routing, delivery and servicing arrangements, vehicle holding and turning, contractor parking, wheel washing, measures to avoid inappropriate routing through nearby villages, measures to minimise conflict with vulnerable road users, and a commitment to deliveries only arriving at or leaving the site outside peak traffic periods. Thereafter, the approved CTMP shall be implemented and operated in accordance with the approved details.

Reason - In the interests of highway safety and the residential amenities of neighbouring occupiers.

Framework Travel Plan

Prior to occupation, a Framework Travel Plan meeting the requirements set out in the Oxfordshire County Council guidance document, “Transport for New Developments; Transport Assessments and Travel Plans” shall be submitted to and approved in writing by the Local Planning Authority.

Reason – to encourage occupiers to use sustainable modes of transport as much as possible in line with the NPPF

Officer’s Name: [redacted]
Officer’s Title: Transport Development Technical Lead (Cherwell Area)
Date: 12 September 2026

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Lead Local Flood Authority

Recommendation:

Holding objection

Key issues:

The surface water flood risk across the site requires further modelling, maintenance of existing drainage systems and watercourses. This is needed to identify suitable areas for development, reduce existing flood risk to accesses, buildings and developable areas, and improve opportunities for drainage discharge by gravity. Proposed finished floor levels may not be sufficient.

Work is proposed to address these points, however the flood risk to the site and viability of the proposed discharge locations is dependent on them. As such the LLFA objects to the proposals and recommends that further modelling and maintenance works are undertaken prior to a decision being made on permitting the development.

Given that the drainage strategy is fundamental to determining whether the proposed development can be safely accommodated on the site, the LLFA considers that key matters should be resolved before determination rather than deferred wholly to post-permission conditions. This includes the hydraulic modelling, drainage asset condition information, proposed climate change allowance, attenuation strategy, infiltration testing and evidence of viable discharge locations.

Additionally, FEH rainfall data should be used for calculations, SuDS features should be considered further to improve runoff quality and opportunities for gravity discharges, flow controls should be designed to reduce blockage risks, exceedance flow routes should be demonstrated on a plan, and more certainty on the design would improve the water quality and maintenance information provided.

Detailed comments:

The site is at risk of flooding from surface water. The existing surface water drainage system is described as not maintained and non-functional. A description of the site states that evidence of surface water ponding is clear in parts of the site. The surface water flood risk must be modelled further, incorporating drainage asset condition surveys and measured ground, watercourse and drainage system levels. This should help to determine where the suitable areas for development are within the site area.

Existing and retained buildings and roads will drain as they do currently, however maintenance would be required to ensure that they are functional in order to reduce

the existing flood risk to the site, and to be included in any further flood risk modelling. Additionally, watercourses should be maintained in accordance with riparian responsibilities, to reduce the risk of standing water and assist with determining a suitable outfall location for the proposed drainage system.

Groundwater levels are recorded to be high within the site. This and possible contamination of the ground are likely to inhibit opportunities for infiltration drainage, however further investigation into this should be carried out. It is proposed that runoff from existing brownfield and greenfield areas will be attenuated and discharged at greenfield runoff rates, which is acceptable in principle.

Hydraulic modelling must consider the latest FEH rainfall data rather than FSR data. Space constraints have limited the opportunity for open SuDS features, however the reliance on attenuation tanks introduces level constraints for the outfall. A pump is proposed as a result, however this should be avoided if possible by investigating whether shallower surface water features are viable. Additional consideration of pump operation and maintenance must be included in any management documentation. Note that ditches may need maintenance, possibly altering bed and water levels favourably for new outfalls.

The use of flow control devices with an orifice of less than 50mm is a concern on a site that is shown to have experienced poor maintenance for existing drainage systems. The risk of blockage is increased with smaller orifice dimensions, especially when used with attenuation tanks with limited visibility of the outlet. No exceedance flow routing has been demonstrate don a plan in the event of an exceedance event or issues with the drainage system.

Details of water quality controls and maintenance requirements are brief in the absence of any detailed design. Consideration must be given to the simple index approach to ensure that runoff is effectively treated prior to discharge, ideally through recognised SuDS features rather than proprietary treatment systems. The use of separators etc must be backed up with manufacturer specified pollution mitigation indices.

The LLFA does not comment on foul drainage proposals.

Officer's Name: [redacted]
Officer's Title: Team Leader – SuDs and Surface Water
Date:17 September 2026

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Public Health

Recommendation:

Objection subject to further information.

Key issues:

- Health Impact Assessment (HIA)
- Mental Health and Wellbeing
- Healthcare Access and Capacity
- Community Cohesion
- Physical Activity
- Noise
- Air Quality
- Infectious Disease Control
- Age Assessment Safeguards
- Welfare & Social Care
- Emergency Services Capacity
- Transport & Highway Safety
- Community Engagement
- Equalities Impact Evidence
- Flood Risk

Detailed comments:

Oxfordshire County Council's Public Health team welcomes the opportunity to comment on the proposed temporary use of part of the Ministry of Defence site at Bicester (MOD015) as accommodation for up to 1,256 asylum seekers. Key points to note from the supporting statement documents for the application are:

- All adult male facility (18 – 65 years old)
- 1,256 capacity/ 130 staff
- Turnover arrivals/ departures: max stay 90 days
- Non-detained site
- 24/7 operational use/ 10.22 hectares
- Most facilities will be on-site including welfare and health (i.e. routine, primary health care facilities) - this will reduce need to travel
- Estimated 30 minibus shuttle trips a day
- Acknowledges increased needs physical/ mental health needs of asylum seekers
- Piddington 1.3km / Arncott 1.6km away
- 3-phased development: will be quick with bedspaces to become available in 2026

We recognise the significant national context underpinning the proposal and welcome the applicant's intention to provide a range of onsite services, including healthcare space, welfare support, recreation facilities and safeguarding

arrangements. However, there are significant concerns regarding the extent to which health and wellbeing impacts have been assessed and demonstrated within the documentation.

Health Impact Assessment (HIA)
The most significant concern is the absence of a Health Impact Assessment (HIA). While the submitted EqIA contains some consideration of health-related issues, including healthcare provision, safeguarding, wellbeing support and community relations, it is primarily a statutory assessment of impacts on protected characteristics under the Equality Act 2010 rather than a comprehensive assessment of health impacts. The document does not provide a systematic assessment of the likely impacts on health, wellbeing, health inequalities, access to services or the wider determinants of health for either future residents of the site or surrounding communities. The Public Health team does not consider the EqIA to be an adequate substitute for a Health Impact Assessment. A proportionate HIA would ordinarily be expected for a proposal of this scale and nature, particularly given the proposed accommodation of up to 1,256 residents on a relatively self-contained site. Further information on what is expected from an HIA can be found on the Oxfordshire Leaders Joint Committee website, including the Oxfordshire HIA Toolkit.

The applicant should provide a proportionate Health Impact Assessment that considers:

- Physical health and mental wellbeing.
- Existing and anticipated health inequalities.
- The health needs of asylum seekers and people with histories of trauma.
- Community cohesion and social integration.
- Access to healthcare and specialist services.
- Access to green space, recreation and opportunities for physical activity.
- Accessibility of local services and transport connections.
- Potential impacts on the wider community and local services.
- Mitigation, monitoring and governance arrangements.

Mental Health and Wellbeing
The EqIA refers to welfare support, safeguarding arrangements, recreational facilities and multi-faith provision, which are all welcomed. However, there is limited assessment of the likely mental health impacts associated with accommodating a large number of single adult males seeking asylum within a collective residential setting. Factors such as previous trauma, uncertainty regarding asylum status, social isolation, limited opportunities for purposeful activity and integration into the wider community can have significant implications for mental wellbeing and should be explicitly assessed.

Healthcare Access and Capacity
It is welcomed that the proposal intends to provide healthcare space onsite and seeks to minimise demand on local primary care services through engagement with health partners. The recognition that onsite provision may reduce pressure on community services is positive.
However, the submitted documents do not demonstrate:

- The nature and scope of healthcare provision that will be available onsite.

- Whether healthcare capacity assessments have been undertaken.
- How specialist healthcare needs will be met.
- How residents will access secondary care and emergency services.
- The arrangements for interpreting and advocacy services.

Given the scale of the proposed accommodation, further evidence is required to demonstrate how healthcare needs will be met without adversely affecting existing local provision.

Community Cohesion

The EqIA appropriately acknowledges the potential for community anxiety, protest activity, concerns regarding social cohesion and fear of crime, and references continued engagement with local stakeholders. This recognition is welcomed. However, the Public Health team considers that the likely impacts on community cohesion require more detailed assessment. Good health outcomes are influenced by opportunities for participation, social connection, inclusion and access to community assets.

Physical Activity

It is welcomed that the proposal includes a range of onsite facilities that could support physical activity and wellbeing, including a gym, recreation space and sports pitches. The provision of a largely self-contained site may reduce the need for some journeys and provide opportunities for recreation and physical activity within the site. The Transport Assessment and Travel Plan demonstrate that active travel and accessibility have been considered. The documents identify nearby Public Rights of Way, cycling catchments and public transport connections, and include cycle parking, changing facilities and shower provision for staff.

However, the submitted evidence also confirms that the site is in a relatively isolated rural location with limited pedestrian infrastructure, few local amenities within walking distance, and limited opportunities for everyday active travel. Both documents acknowledge that accessibility by sustainable travel modes is not ideal and that residents are expected to rely on shuttle buses and onsite provision to access many services and facilities. Further consideration should therefore be given within a Health Impact Assessment to the implications of this relative isolation for long-term wellbeing, social inclusion and opportunities for independent mobility.

Noise

The submitted Noise Impact Assessment concludes that the majority of the site experiences negligible to low noise risk, although some areas near the B4011 fall within low to medium risk categories. Acoustic mitigation may therefore be required in parts of the site. While the technical assessment appears proportionate and identifies mitigation where necessary, the Public Health team notes that noise can affect sleep, wellbeing and quality of life. Further assurance should be provided that accommodation units and outdoor spaces will be designed to minimise adverse effects on residents.

Air Quality

The Air Quality Screening Technical Note concludes that operational impacts are not significant and that anticipated traffic generation falls below recognised assessment thresholds. Construction impacts are assessed as low risk subject to mitigation

measures. The Public Health team notes these conclusions and raises no specific concerns regarding the methodology presented. However, the future HIA should consider air quality alongside wider environmental and health determinants rather than in isolation.

Infectious Disease Prevention and Control
Further information is required on locally agreed arrangements for assessing and managing infectious disease risks, including vaccination, prescribing, treatment, isolation and contact tracing. The applicant should demonstrate that sufficient accommodation can be made available to isolate symptomatic residents, including suitable limits on room occupancy and adequate spare-room capacity, and explain how contact tracing and outbreak control would be managed.

Safeguarding and Age Assessment
The proposal is described as adult-only, but the application should explain how the risk of inaccurate age assessment will be mitigated. It should also set out the safeguarding process, immediate support and suitable accommodation arrangements that would apply if a resident were subsequently found to be under 18.

Adult Social Care and Pressure on Local Services
Further clarity is required on government and provider responsibilities for welfare and social care, the precise support available on site, and the evidence from comparable accommodation sites regarding safeguarding referrals, hospital admissions and other demand on local services. The applicant should demonstrate how additional demand on local authority, health and voluntary services would be funded and mitigated in a timely manner.

Fire and Emergency Service Considerations
The application should address the implications of the increased on-site population for emergency service capacity and the fire and rescue crew model. It should also respond to risks associated with hazardous buildings, including asbestos roofs, fire separation between temporary accommodation units, and wildfire risk arising from the surrounding rural area. The nearby Gypsy and Traveller site should be included in emergency planning and risk assessment.

Transport and Highway Safety
The applicant should demonstrate how road injury risk will be minimised for residents, staff and visitors given the limited bus services, lack of continuous footways, limited cycle infrastructure and absence of street lighting on relevant routes. This should include a quantified assessment of likely independent pedestrian movements from a non-detained site, clarification of shuttle-bus frequency, capacity, operating hours and destinations, and confirmation of how pedestrian demand to nearby villages, bus stops and recreation facilities would be safely accommodated. Clarification is also required on whether cycle storage is intended for staff, residents or both, how safe cycling will be supported for people unfamiliar with local roads and the Highway Code, and what lessons have been applied from comparable isolated sites. (see also the Transport Schedule of this response).

Community Engagement and Voluntary Sector Capacity
The application should set out a clear community and partner engagement approach, together with mitigation for community tensions, protest activity and pressure on communications services. It should explain when the communications plan will be shared, what has been learned from comparable sites, and how cross-boundary implications will be managed given the proximity to Buckinghamshire. Evidence is also required on the capacity and resourcing of the voluntary and community sector to support a facility of this scale, including delivery of ESOL, volunteering, cultural familiarisation and other purposeful activities.

Impacts on Nearby Communities
The Equalities Impact Assessment should substantiate its conclusions concerning effects on nearby communities, including wellbeing, community cohesion, fear of crime and the management of protests or disorder. It should also assess whether operational noise could adversely affect the amenity of nearby villages and businesses, alongside the assessment of noise effects on future residents.

Flood Risk
The applicant should provide assurance that the development would not be located within an area of unacceptable flood risk and would not displace water or otherwise increase flood risk to surrounding communities (see Lead Local Flood Authority schedule of this response).

Conclusion
Oxfordshire County Council's Public Health team cannot currently support the application on health and wellbeing grounds due to the absence of a Health Impact Assessment and insufficient evidence regarding the likely health impacts of accommodating up to 1,256 asylum seekers at this site.

We therefore recommend that:

1. A proportionate Health Impact Assessment is submitted.
2. Additional evidence is provided regarding healthcare provision and capacity to address all matters set out above.
3. Mental health and wellbeing impacts are comprehensively assessed.
4. Measures to support community cohesion, integration and meaningful activity are clearly described.
5. Monitoring and mitigation arrangements are established for both resident wellbeing and impacts on local services.
6. Further information is provided on arrangements for infectious disease prevention and control, including vaccination, prescribing, treatment, isolation, contact tracing and outbreak management, together with evidence that sufficient accommodation is available to isolate symptomatic residents.
7. The applicant explains how the risk of incorrect age assessments will be mitigated and sets out safeguarding, support and accommodation arrangements for any individual subsequently identified as being under the age of 18.
8. Greater clarity is provided regarding government and provider responsibilities for welfare and social care, the support available on site, likely demand on

local services, and how any additional impacts on statutory and voluntary services will be funded and mitigated.

9. The implications for fire and emergency service capacity are assessed, and appropriate mitigation is identified in relation to hazardous buildings, asbestos-containing structures, fire separation, wildfire risk and emergency planning for neighbouring communities, including the nearby Gypsy and Traveller site.
10. The applicant demonstrates how transport and highway safety risks for residents, staff and visitors will be minimised, clarifies cycle storage and active travel arrangements, and explains how lessons from comparable accommodation sites have informed the proposal (plus other requirements detailed in the transport schedule of this response).
11. A comprehensive community engagement and communications strategy is provided, including measures to manage community tensions and protest activity, arrangements for cross-boundary engagement, and evidence that the voluntary and community sector has sufficient capacity and resources to support a development of this scale.
12. Robust evidence is provided to substantiate the conclusions of the Equalities Impact Assessment, including consideration of impacts on community cohesion, wellbeing, fear of crime, protest management and operational noise affecting nearby communities and businesses.
13. The applicant demonstrates that the development would not be located within an area of unacceptable flood risk and would not increase flood risk to surrounding communities (plus other requirements detailed in the LLFA schedule of this response).

Subject to the submission of this information and the implementation of appropriate mitigation measures, the Public Health team would welcome the opportunity to review the proposal further.

Prepared with assistance from Microsoft Copilot and developed by the author.

Officers: [redacted] **(Health Improvement Practitioner) and** [redacted] **(Head of Migration Policy and Partnerships)**
Date: 15/09/2026

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Oxfordshire Fire and Rescue Service

Recommendation:

Comments

Fire Service

Oxfordshire Fire and Rescue Service (OFRS) has considered the application from the perspective of its fire safety and operational fire and rescue responsibilities.

Fire Safety

OFRS is not acting as the fire safety enforcing authority for these Crown premises. Fire safety enforcement will be undertaken through the appropriate Crown enforcement arrangements.

OFRS will work with Crown Fire Safety in relation to ensuring compliance with Requirements B1–B5 of the Building Regulations 2010. This will include ensuring that adequate water supplies and suitable access are provided for firefighting operations.

OFRS's comments should therefore not be interpreted as regulatory approval of, or objection to, the proposed fire safety strategy.

OFRS requested access to the complete unredacted Fire Strategy Report because a meaningful technical review of a fire strategy ordinarily requires consideration of the document as a whole, including its assumptions, dependencies and the interaction between the various fire safety provisions.

The complete unredacted Fire Strategy Report has not been made available to OFRS. Consequently, OFRS is not in a position to provide a complete substantive technical assessment of the proposed fire strategy or to express either an objection or no objection to that strategy.

OFRS would expect the appropriate Crown fire safety enforcing authority and relevant building control body to consider the detailed fire safety provisions through the applicable regulatory processes.

Fire Service Operational Response

Separate from those regulatory functions, OFRS retains an operational interest in the development. Appropriate engagement should therefore take place with OFRS before

occupation to support operational familiarisation and pre-incident planning. This should include, where relevant:

- emergency vehicle access and circulation within the site;
- suitable access and positioning for fire appliances;
- the availability and adequacy of firefighting water supplies;
- relevant information concerning site-specific hazards that may affect firefighter safety or operational response;
- arrangements associated with the phased development and occupation of the site where these may affect emergency response;
- appropriate liaison arrangements between the site operator and OFRS; and
- consideration of the management of unforeseen incidents and hazards associated with the site and its surrounding environment, including wildfire and flooding risks.

These operational matters should not be interpreted as OFRS assuming responsibility for fire safety enforcement or approval of the fire strategy, which remains subject to the appropriate Crown and building control regulatory arrangements.

Officer's Name: Oxfordshire Fire and Rescue Service
Officer's Title: Fire Protection Technical Manager
Date: 17 September 2026

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Joint Oxfordshire Resilience Team

Recommendation:

Comments

Key issues:
Site is in Flood zones 2 and 3 (partially)
High to low risk of Surface water flooding across whole of site

Detailed comments:

Any development within flood zone 3 should have suitable drainage and flood mitigation in place as part of the planning. Build should consider lockable drain covers, electricity boards and sockets raised above floor height and design that is flood resilient.

Any development should have access and egress that remains above flood height to ensure that residents can always receive care visits, blue light services can access in an emergency, and residents can access pharmacists, shops and other essential services. The emergency planning assumptions should reflect the scale and non-detained nature of the proposed use, including how residents, staff and visitors would be safely managed during flooding, severe weather, fire, disorder or other emergency incidents. No build should place an additional strain on local services such as the Council or blue light responders during an emergency.

A development within flood zone 3 should ensure that residents are aware of the Flood Zone 3 risk and that there is a community emergency/flood plan in place.
It should be ensured that there is an accessible access/egress route into any development route from the public highway rather than a single access to a public highway which closes during a flooding event.

Any such builds must have an emergency plan in place that does not place any additional strain on Council or Blue Light Category 1 responders.

Officer's Name: [redacted]
Officer's Title: Senior Resilience Officer
Date: 17/09/2026

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Archaeology

Recommendation:

No objection subject to conditions

Detailed comments:

The site lies in an area of archaeological interest and potential, 2.5km south of the Roman Akeman Street, and 5km southeast of the Roman town and parade ground at Alchester. To support a previous application on the site, an archaeological evaluation was undertaken across the majority of the proposal area, between the existing buildings (Oxford Archaeology 2002). No archaeological features or deposits were recorded during this evaluation, though pottery dating from the 11th – 16th century was recovered from the ploughsoil. This may suggest a low level of Medieval – post Medieval occupation, though the evaluation was limited in scope due to the placement of the trenches surrounding the existing buildings. Ridge and furrow earthworks, likely dating from the Medieval period, are extensive and well-preserved in the surrounding farmland.

The applicant has submitted an Archaeological and Heritage Desk Based Assessment (author is redacted). The evaluation carried out on the proposal site is referred to in the assessment as a Watching Brief (para. 6.3). This assessment highlights the archaeological potential of the area, particularly for Roman remains. The submitted documents do not include detailed plans of the proposed development, and so we have to provide general advice. If the demolition of the existing buildings includes removal of the hardstanding and erection of buildings in locations which have not previously been developed, then an archaeological investigation will be required. If the proposed buildings are contained within the footprints of the existing buildings, or do not need new foundation excavations, then archaeological mitigation will not be required.

Conditions:

We would, therefore, recommend that, should planning permission be granted, the applicant should be responsible for ensuring the implementation of a staged programme of archaeological investigation to be maintained during the period of construction. This can be ensured through the attachment of a suitable negative condition along the lines of:

Prior to any demolition and the commencement of the development a professional archaeological organisation acceptable to the Local Planning Authority shall prepare an Archaeological Written Scheme of Investigation, relating to the application site area, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason - To safeguard the recording of archaeological matters within the site in accordance with the NPPF (2026).

2. Following the approval of the Written Scheme of Investigation referred to in condition 1, and prior to any demolition on the site and the commencement of the development (other than in accordance with the agreed Written Scheme of Investigation), a staged programme of archaeological evaluation and mitigation shall be carried out by the commissioned archaeological organisation in accordance with the approved Written Scheme of Investigation. The programme of work shall include all processing, research and analysis necessary to produce an accessible and useable archive and a full report for publication which shall be submitted to the Local Planning Authority within two years of the completion of the archaeological fieldwork.

Reason – To safeguard the identification, recording, analysis and archiving of heritage assets before they are lost and to advance understanding of the heritage assets in their wider context through publication and dissemination of the evidence in accordance with the NPPF (2026).

Officer's Name: Oxfordshire County Archaeological Services
Officer's Title: Planning Archaeologist
Date: 11/09/26

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Ecology

Recommendation:

Objection subject to further information.

Comments:

The application is accompanied by a Preliminary Ecological Appraisal which flags the need for further (phase 2) ecological survey to support a planning application, including for hazel dormouse, water vole, bats, breeding birds (including barn owl), great crested newt, reptiles, and invertebrates. Results of these surveys should be submitted to support the application, in accordance with Natural England's standing advice, and para 99 of Circular 06/05. The information submitted should include an assessment of the impact of the proposed development on protected or priority species, priority habitats and designated sites and identify appropriate avoidance, mitigation or compensation measures in line with requirements of policy N2 of the NPPF and Policy ESD10 of the Cherwell Local Plan 2011-2031.

The Preliminary Ecological Appraisal needs to be informed by a data search from the Thames Valley Environmental Records Centre. The PEA report indicates that a data search from Bucks and Milton Keynes Environmental Records Centre informed the appraisal; whilst the data search area may include areas within Buckinghamshire, the application site falls within Oxfordshire and therefore additional data pertaining to species, habitats and sites in Oxfordshire, held by TVERC needs to be obtained to inform the assessment. The Thames Valley Environmental Records Centre data indicates that there are protected species records in the area including for otter, great crested newt and badger, as well as numerous records for hairstreak butterflies, and a Local Wildlife Site within 2km; it is apparent that this data has not informed the Preliminary Ecological Appraisal

The wider Bicester Garrison is a known stronghold for great crested newts and hairstreak butterflies, with Bicester Garrison Conservation Group managing areas to support these, and other, priority species. Several new ponds have been created in the wider area under the NatureSpace Great crested Newt District Level Licence scheme.

Both Cherwell District Council and Oxfordshire County Council participate in the NatureSpace District Level Licence Scheme for great crested newts; it is recommended that the applicant discuss with NatureSpace and Natural England as to whether either of these licences can be used when neither LPA is the determining authority for the application, as this could provide an alternative approach to the great crested newt surveys recommended in the Preliminary Ecological Appraisal.

As an urgent Crown development, the application is exempt from biodiversity net gain requirements under the Environment Act 2021. However, opportunities to connect to and strengthen ecological networks, and include features which support priority or threatened species should be taken in line with policy N2 of the NPPF and Policy ESD10 of the Cherwell Local Plan 2011-2031. To inform such an approach reference should be made the results of phase 2 ecological surveys and the priorities and mapping in the Oxfordshire Local Nature Recovery Strategy, as well as considering opportunities to support and extend the work of the Bicester Garrison Conservation Group.

Officer's Name: [redacted]
Officer's Title: Landscape and Nature Recovery Team Leader
Date: 16 September 2026

Annex 1: Member Views

Application no: PCU/RARE/C3105/3378843 (26/01833/CROWN)
Location: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

MEMBER VIEWS

Cllr: Sean Gaul **Division: Bicester East**

Comments:

I am writing as an Oxfordshire resident and elected councillor for Oxfordshire County Council to object to planning application PCU/RARE/C3105/3378843, the proposed 1,256-person asylum accommodation centre at Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE.

I ask that planning permission be refused.

The National Audit Office has previously raised serious concerns about the Home Office's large-sites asylum accommodation programme.

Its March 2024 findings concluded that the programme was expected to cost more overall than the hotels it was intended to replace, rather than delivering the savings originally projected.

The published representation period runs from 7 to 17 September 2026, just 11 days, roughly half the 21 day minimum that applies to ordinary planning applications under the Town and Country Planning Act 1990, and that is prescribed at every stage of the standard Crown Development route. Nearly two months passed between the application being submitted on 6 July 2026 and it being published for comment on 2 September 2026, and its supporting documents run to well over 1,000 pages across multiple technical disciplines. I do not believe 11 days gives residents, councils or technical specialists a fair opportunity to examine an application of this scale and complexity.

The application does not demonstrate a confirmed, reliable permanent electricity or wastewater solution.

The Utilities and Infrastructure Assessment says the condition and capacity of the existing electricity network cannot presently be relied upon, while questions also remain over sewage capacity and the proposed wastewater arrangements.

The Transport Assessment repeatedly refers to the B1104, rather than the B4011 which actually borders the site.

The objection evidence also identifies a history of injury collisions on the nearby B4011 and the lack of a continuous footway or lighting along much of the route.

The documents acknowledge that hospital care would not be provided on site. Questions have therefore been raised about the additional demand that could fall on existing local health and emergency services.

Site A does not form part of the development for which Cherwell's existing Infrastructure Delivery Plan was prepared, raising questions about how the additional infrastructure requirements would be accommodated.

Taken together, these issues mean I do not believe the applicant has demonstrated that Site A is a suitable location for a development of this scale.

I therefore respectfully request that planning permission be refused.

If the Secretary of State is nevertheless minded to approve the application, I ask that no decision is made until outstanding work concerning drainage, flooding, wastewater, contamination, ecology, highways, pedestrian safety, power supply, lighting, noise, fire safety and decommissioning has been completed and made available for proper scrutiny.

Date: 17/09/2026

OXFORDSHIRE COUNTY COUNCIL

Crown Casework Team
Ministry of Housing, Communities & Local Government

By email to:

Crowncasework@communities.gov.uk

The Leader's Office
Oxfordshire County Council
County Hall
New Road
Oxford
Oxfordshire
OX1 1ND

Councillor Neil Fawcett
Deputy Leader of the Council

17 September 2026

Dear Sir or Madam

Re: URGENT CROWN DEVELOPMENT APPLICATION MOD BICESTER SITE A: PROPOSED NON-DETAINED ASYLUM ACCOMMODATION
Ref. PCU/RARE/C3105/3378843 (26/01833/CROWN)

I am writing to you as Deputy Leader of Oxfordshire County Council to object to the proposed use of MOD Bicester Site A as large-scale asylum accommodation in our area.

Our commitment is to ensure that anyone placed in the county by the Home Office is treated with basic dignity and humanity. Oxfordshire County Council does not consider that this proposal meets this commitment as it will be placing large numbers of people in an isolated site, in unsuitable accommodation, unable to work or volunteer and with limited access to basic services which are contrary to the integration, cohesion, safeguarding and public health policies and principles we aspire to. Such conditions do little to help people become part of, and contribute to, the communities in which they are living.

We will continue to speak up for the needs, safety and dignity of all our residents, both new and settled across Oxfordshire.

MOD Bicester site A is poorly connected to surrounding settlements and lacks access to buses, footways, cycleways and street lighting. There are unresolved questions about flood risk, land contamination, wildfire, hazardous materials and risks relating to fire protection between temporary accommodation units. These issues directly affect whether the site can safely accommodate such a large number of people.

Whilst the application recognises that people seeking asylum may have increased physical and mental health needs, the Council has not received sufficient assurance about how these needs will be met. From a Public Health perspective, locally agreed arrangements for infectious disease prevention and outbreak management need to be put in place by the Home Office, alongside greater clarity on vaccination, prescribing, isolation capacity, contact tracing, room occupancy and the availability of spare rooms should there be an outbreak. Moreover, there is a question about whether shared

modular accommodation can remain safe and suitable during increasingly extreme temperatures.

The proposal also gives insufficient detail on mental health support and privacy for people experiencing poor mental wellbeing or post-traumatic stress. A large institutional setting, with limited privacy and rapid turnover, could worsen distress for people who need stability and humane support.

Although the proposal is intended for adult males, errors in age assessments by the Home Office remain a significant risk. The Council requires clear, operational arrangements for identifying, safeguarding and the prompt relocation of any child who presents at the site. General references within the proposal to national guidance do not provide the site-specific safeguards needed for a facility of this scale.

The assumption that on site provision will make the development self-sufficient is not supported by adequate operational or financial detail. The Council has not received clear commitments about the range, capacity and quality of welfare and health services that will be provided on the site, nor how additional demands on adult social care, safeguarding, public health, fire and rescue, hospitals, transport and other local services would be assessed, funded and mitigated. The same concern applies to the capacity of local voluntary and community organisations to provide support at such a large scale.

The handling of the proposal by government has undermined confidence from the outset. Local authorities received less than 24 hours' notice and there was no prior engagement with local residents or partners. The application gives limited consideration to the impact on nearby communities, despite acknowledging possible anxiety, protest, demonstration or disorder associated with a non-detained site. The proximity to the Buckinghamshire border also gives the proposal a wider impact. Thames Valley Police, who have already had to engage with tensions before construction has begun, should be provided with additional financial support to keep people safe.

Moreover, the Council has not seen a sufficiently developed community engagement plan from government to prevent and respond to misinformation and community tensions. Decisions of this scale must be developed transparently and in genuine partnership with local communities which has not happened here.

Supporting people in need and standing alongside local communities are not mutually exclusive. A responsible asylum accommodation policy must do both. In the Council's view, this proposal does neither.

Yours sincerely,

[redacted]

Cllr Neil Fawcett
Deputy Leader, Oxfordshire County Council

[redacted]

creating a better place
for people and wildlife

Environment Agency

Planning Casework Unit
Ministry of Housing, Communities
& Local Government
23 Stephenson Street
Birmingham
B2 4BH

Reference: PA-0011495/01
Customer reference: 26/01833/CROWN
Crown reference: PCU/RARE/C3105/3378843
16 September 2026

Full Planning Application for Urgent Crown Development comprising the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation. The Proposed Development comprises the retention and change of use of Building A6, the demolition of existing buildings and structures, the erection of new modular accommodation, and the provision of space for associated health and welfare facilities, site infrastructure, waste water treatment plant, roads, access ways, security infrastructure, parking, staff accommodation and facilities, and open space and recreational areas, to accommodate up to 1,256 service users.

MOD Bicester (A-Site) OX25 1AE

Dear [redacted]

Thank you for contacting us regarding this Urgent Crown Application. We wish to raise material planning considerations on both Flood Risk, Pollution Prevention and Groundwater Protection grounds.

Environment Agency position

Flood Risk

As part of this consultation, we have reviewed the following documents:

- Flood Risk Assessment Rev P02 (FRA), dated June 2026
- Parameters site plan Rev P01 *BIC-DR-AR-100107*, dated 20th May 2026

We acknowledge that a small section of the site falls within Flood Zone 3, defined by the National Planning Policy Framework (NPPF) and associated Flood Risk and Coastal Change Planning Policy Guidance (PPG) as having a high probability of

flooding, as shown in Figure 4-2 of the FRA. Flood Map for Planning (FMfP) in this area is based on national modelling (JFLOW), published in 2004. The purpose of JFLOW was to produce flood maps for all catchments greater than 3km^2 in a consistent manner, to be used by Planning Authorities when screening for constraints. The method was very generalised and therefore did not take account of information that may be very significant locally, such as structures, features or roads. This means that there is significant uncertainty in the extents and depths shown by the FMfP in this location.

The New National Model (NNM) was published in 2025 as part of the New National Flood Risk Assessment (NaFRA2). It is a set of models giving national coverage and providing flood risk information for rivers, the sea and surface water. The NNM includes more modelled scenarios than previous national modelling, including climate change runs. This informs the Risk of Flooding from Rivers and Sea (RoFRS) map shown in Figure 4-3 of the FRA. However, we have concerns that fluvial flood risk is underrepresented by the NNM in this area when compared to historic flood records in Islip and Blackthorn. Therefore, we consider JFLOW (2004) is the best available data in this location.

We note from section 4.2.6 of the FRA that the site is at low risk from fluvial sources. However, the submitted FRA does not assess the quality of the flood risk data available. The FRA should assess whether the available flood risk information is suitable to inform a site-specific FRA and update it where necessary. For development of this scale and nature, we would expect site-specific, detailed modelling to be undertaken where there is a likelihood of fluvial/river flooding, to better understand the risk posed to the development. Detailed modelling can take a significant amount of time to be created and reviewed to check it is suitable to inform the FRA, therefore a more proportionate assessment (for example, comparing topography against the local river network) would also be welcomed.

We have undertaken a light-touch assessment of the extent of Flood Zone 3 against local knowledge and the best available information. Our mapping shows that the application site is 3-4 metres above the bank of the River Ray. In our expert opinion, flood depths in this catchment do not reach depths on this scale therefore direct flooding from the River Ray is unlikely. However, there are ordinary watercourses on this site that are not represented by JFLOW or the NNM. It is not clear whether these are isolated drains or part of the wider river network.

Whilst there is a high level of uncertainty in the mapping of the Flood Zones in this location, we consider that there is a very low practical risk of fluvial flooding at the site if the watercourses on site are not directly connected to the wider river network.

Pollution Prevention

As part of this consultation, we have reviewed the following documents:

- Drainage Design Statement *ONF-15-RP-CV-100004,* dated June 2026
- Drainage design letter from Natural England *DAS/ A024337,* dated 23 July 2026

The application form states that foul drainage would go to mains sewer, cess pit and package treatment plant, therefore it appears there has been no concrete decision has been made regarding drainage. Until this has been decided, we are unable to fully assess any potential environmental impacts.

As the site is already connected to foul sewer, we would expect the Applicant to connect to mains unless there is a clear and robust justification for not doing so. Our guidance states: “The Environment Agency will not give you a permit for a private sewage treatment system if it’s reasonable for you to connect to the public sewer”: https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits#discharges-in-sewered-areas. Connection to mains would be the quickest, simplest and best environmental option, especially due to concerns regarding the potential impacts to Arncott Bridge SSSI.

Constructing a sewage treatment works appears to be a more recent idea, as the Natural England assessment was based on foul sewer connection, and this is also what is being proposed in the Infrastructure Assessment. It is unclear why this option is being explored when there is a foul sewer connection to the site.

The proposed development will be acceptable if the following measure is implemented and secured by way of a planning condition on any planning permission.

Condition – Foul Drainage

The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul drainage has been submitted to, and approved in writing by, the planning authority. The scheme shall be implemented as approved.

Reason(s)

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with Policy P2 (b) of the NPPF.

Informative – Package Treatment Plant

When preparing a foul drainage strategy, you should be mindful that private sewage treatment facilities should only be used where it is not feasible for a development to be connected to a public sewer: Discharges to surface water and groundwater. This is due to the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems.

The PPG (Water supply, wastewater and water quality, ref ID: 34-020-20140306) advises that the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where, having taken into account the cost and/or practicability, it can be shown to the satisfaction of the planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

As the regulator for discharges from private sewerage systems including package treatment plants, we expect that developments will discharge their domestic sewage or trade effluent to the public sewerage system whenever it is reasonable to do so. We do not consider a lack of capacity in the existing public sewerage network a reason not to connect to the public sewer and we are unlikely to be able to grant a permit in such scenarios: Discharges to surface water and groundwater: environmental permits - GOV.UK.

We advise that the applicant, planning authority and Water and Sewerage Company (WaSC) engage in discussions to ensure any claim by the WaSC that the sewer system is at capacity and that the development would result in unacceptable risk to the environment is fully evidenced. If the planning authority is satisfied that the evidence from the WaSC supports the view that the environmental risk posed by connection to sewer would be unacceptable and the applicant wants to further understand our permitting position that obtaining an environmental permit is unlikely, they should refer to Environment Agency permitting guidance: Discharges to surface water and groundwater: environmental permits - GOV.UK. If the Applicant thinks they can make a case in line with this guidance for a private package treatment plant and wish to discuss this, they can engage with us through pre-permit application discussions: Get advice before you apply for an environmental permit. This is a chargeable service.

For permitting enquiries, we recommend that the applicant contacts our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Groundwater and Contaminated Land

As part of this consultation, we have reviewed the following documents:

- Preliminary Geo-environmental and Geotechnical Assessment Revision P02, dated May 2026.

The site is underlain by superficial Alluvium Deposits (Secondary A) above the Stewartby and Peterborough Member Mudstones which are classified as unproductive aquifer. It is not clear whether a search for private water supplies was made as part of the desk study. Groundwater sensitivity at this location is therefore moderate.

Previous uses of the site include a railway line and Ministry of Defence depot, which may have stored potential contaminants. This has not been explored further within the report or reflected in the proposed intrusive investigation.

Site walkover photos and information gained from the site walkover, including site usage, access, ground cover, on-site structures, presence of tanks (other than fuel storage) and utilities has been redacted. Additionally, information from previous investigations and reports that have been completed at the site have been redacted. This includes the WYG Defence Estate Optimisation Programme Phase I Land Quality Assessment (LQA) Bicester Garrison (WYG, 2018).

Table 4-1 details the key risks and associated mitigations at the site. In relation to land contamination only asbestos containing material is mentioned. The possibility of other contaminants from the sites previous uses (as railway land and operational depot) has not been explored.

The conceptual site model presented in Appendix E does not adequately consider groundwater as a receptor.

Section 5.1 presents the recommendations for ground investigations, specifically targeting areas where munitions were stored and handled, as well as site wide testing for asbestos containing material. We would expect the scope of the investigation to be broader and in line with the guidance presented in ‘Land Contamination Risk Management’ Land contamination risk management (LCRM) - GOV.UK. This also includes information on the British Standards for site investigation that should be followed.

A search for private water supplies within the vicinity of the site should be included within the next phase of investigation.

The previous use of the proposed development site as a Ministry of Defence depot and railway land presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are sensitive in this location because the proposed development site is located upon a Secondary A aquifer.

The Preliminary Geo-environmental and Geotechnical Assessment document demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the planning authority.

In light of the above, the proposed development will be acceptable if the following measures are implemented and secured by way of planning conditions, including a remediation strategy which is carried out by a competent person in line with P2(1-3) of the NPPF.

Without these conditions, we would object to the proposal in line with P2(1-2) of the NPPF, because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition – Remediation Strategy

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the planning authority. This strategy will include the following components:

1. Up to date Preliminary Risk Assessment (PRA) and conceptual model following the results of an exploratory investigation
2. A detailed site investigation scheme, based on the results from (1) to provide information for a detailed risk assessment to all receptors that may be affected, including those off-site.
3. A tiered risk assessment using the results of the site investigation referred to in (2).
4. An options appraisal including sustainability and treatability studies of the remediation measures required and how they are to be undertaken.
5. A remediation strategy and verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete and identifying any requirements for

longer-term monitoring of pollutant linkages, mitigation, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the planning authority. The scheme shall be implemented as approved.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with P2(1-2) and P3(1-2) of the NPPF.

Condition - Verification report

Prior to any part of the development being occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the site does not pose any further risk to the land and water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph P2(1-2) and P3(1-2) of the NPPF.

Condition - Unsuspected contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the planning authority shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the planning authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water

pollution from previously unidentified contamination sources at the development site. This is in line with P2(1-2) and P3(1-2) of the NPPF.

Surface Water

The previous use of the proposed development site as a Ministry of Defence depot and railway land presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are sensitive in this location because the proposed development site is located upon a Secondary A aquifer.

In light of the above, we do not believe that the use of infiltration SuDS is appropriate in this location. We therefore request that the following planning condition is included as part of any permission granted. Without this condition we would object to the proposed development in line with P2(1-2) and P3(1-2) of the NPPF because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition - SuDS Infiltration of surface water into ground

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with P2(1-2) and P3(1-2) of the NPPF.

Fisheries, biodiversity and geomorphology

As part of this consultation, we have reviewed the following documents:

- Drainage Design Statement *ONF-15-RP-CV-100004,* dated June 2026
- Preliminary Ecological Assessment Appraisal, dated May 2026
- Habitats Regulations Assessment Screening 1st issue, dated 2 July 2026

The NPPF urges Applicants to use sustainable drainage where appropriate, protect and enhance the natural environment and prevent unacceptable pollution of land and water. In addition, the Water Environment Regulations 2017 (WER) require public authorities to have regard to objectives for water bodies and avoid deterioration in ecological or chemical status. Rivers, streams, lakes and groundwater are all protected under this framework. The decision maker should be satisfied that the proposed development would not result in deterioration in the status of any affected surface waterbody or groundwater body or compromise the achievement of WER objectives.

For a large development accommodating 1256 people, potential pollution pathways could include increased foul drainage discharge, accidental pollution incidents, contaminated runoff from roads, parking and service areas and changes to hydrology affecting receiving watercourses.

The applicant does not clearly identify whether foul drainage will discharge to the mains or be treated via a private wastewater treatment works. If a private treatment solution is proposed, further consideration should be given to the location of discharge, receiving environment sensitivity and the potential implications for water quality and WER objectives.

In line with the NPPF and WER 2017, the development should also address and improve the quality of surface water discharges. The proposed drainage strategy provides limited information regarding the treatment and quality of surface water runoff, and it should demonstrate that appropriate treatment stages are incorporated to prevent pollutants from roads, parking areas and operational activities entering groundwater or receiving watercourses.

Water-related ecological issues may include impacts on ponds, ditches, wet grassland, aquatic invertebrates, amphibians, protected species, and downstream designated sites. The protected site (Arncott Bridge Meadows SSSI) features plant species which require both wetter and drier soils. The proposed development will likely have a reduced surface water runoff rate which could make the SSSI drier, but it may also receive less flashy runoff. However, based on the information provided and the separation distance of approximately 1.8 km, significant water-related effects on Arncott Bridge Meadows SSSI are considered unlikely.

If you have any questions regarding our response, please contact

[redacted]

Yours sincerely,

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