**From:** [redacted]

[redacted]

[redacted]

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

[redacted]

**From:** Chris Clark [redacted]
**Sent:** 15 September 2026 07:23
**To:** Crown Casework <Crowncasework@communities.gov.uk>
**Cc:** c[redacted]
**Subject:** Formal Representation – MOD Bicester Site A – PCU/RARE/C3105/3378843

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

Dear Crown Casework Team,
I am writing on behalf of Launton Youth Football Club regarding the proposed development at MOD Bicester Site A.

Application reference: PCU/RARE/C3105/3378843
Launton Youth Football Club operates the Bicester Garrison sports pitches located immediately opposite the proposed development. The club has approximately 334 registered players across 21 teams, with children from Reception age through to under-16 football. The Garrison site is an essential facility used extensively for training and matches throughout the week and at weekends.

Our representation relates specifically to the potential effects of the development on this established youth football facility.

Our principal concerns are:
Increased construction traffic, including HGVs, coaches and contractor vehicles, conflicting with children and families arriving for training and matches.

The absence of a confirmed Construction Traffic Management Plan or quantified construction-traffic movements.

Highway and pedestrian safety on the B4011, particularly given the 50mph speed limit, limited footways and lack of suitable crossing facilities.

Potential displacement parking at or around the football pitches, particularly during weekend fixtures.

Maintaining uninterrupted access to the pitches for players, parents, visiting teams, maintenance vehicles and the emergency services.

The effect of construction noise, dust, lighting and debris on training and matches.

The need for clear and secure separation between the development and an open site used primarily by children.

Potential unauthorised use of the pitches, damage to playing surfaces, litter and uncertainty over responsibility for addressing these issues.

References within the application to community recreation opportunities and the identification of the Bicester Garrison sports pitches as a nearby facility. The club has not been consulted about any possible use of its pitches.

The possible effect on the club's continued use of the Garrison site and any future improvement of its football facilities.

We request that the following requirements are secured through planning conditions or an appropriate site-management agreement:
A Construction Traffic Management Plan must be agreed before work begins, with Launton Youth Football Club consulted as an immediately affected neighbouring organisation.

HGV movements and significant deliveries must be restricted during the club's weekday training periods and weekend match times.

Access to the football pitches and emergency access must remain unobstructed throughout construction and operation.

Appropriate measures must be introduced to prevent development-related parking from being displaced onto the football site.

A suitable highway and pedestrian-safety assessment must specifically consider children and families accessing the sports pitches.

Clear physical and operational separation must be maintained between the accommodation site and the youth football facility.

The Bicester Garrison pitches must not be identified, promoted or used as recreational facilities for the development.

The operator must provide a named, 24-hour community liaison contact so that access, parking, litter, damage, security or safeguarding concerns can be addressed promptly.

Suitable controls must be implemented for construction noise, dust, lighting, working hours and the cleaning of surrounding roads.

Written confirmation must be provided that the development will not affect the club's continued use of the pitches, toilets, storage areas, parking or other associated facilities.

We are concerned that an organisation providing regular activities for hundreds of children immediately opposite the proposed development has not been directly consulted. We therefore request meaningful engagement with Launton Youth Football Club before the application is determined and before any construction or enabling works begin.

Please treat this email as Launton Youth Football Club's formal representation and confirm that it has been received and will be considered by the Secretary of State.
Kind regards

Chris Clark
Chairman
Launton Youth Football Club
[redacted]

**BY EMAIL ONLY TO**
Crowncasework@communities.gov.uk

Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust
Compass House, 1 Farmoor Court,
Farmoor, Oxford, OX2 9LU
Tel: 01865 775476
Email: info@bbowt.org.uk
Visit: bbowt.org.uk

16/09/2026

Dear Sir / Madam,

**Ref number: PCU/RARE/C3105/3378843**

**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.**

The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (**"BBOWT"**) objects to the proposal as it has significant concerns regarding its potential impact on wildlife both off-site and on-site. We set out our concerns below under the following headings:

1) Hydrological impact on SSSIs, Local Wildlife Sites, nature reserves and priority habitats.

2) Loss of rich on-site wildlife habitat, the consequent reduction in ecological connectivity in an area rich in wildlife, potential impact on nearby Local Wildlife Sites, and on species within them that may forage on the proposed development site.

3) Impacts on the opportunity to create a large connected area for wildlife within the Reconnecting Bernwood, Otmoor and Ray project area, the Upper Ray

Conservation Target Area (**"CTA"**) and the Oxfordshire and Buckinghamshire Local Nature Recovery Strategies (**"LNRSs"**).

4) Recreational impact on nearby designated sites and priority habitats.

**1) <u>Hydrological impact on SSSIs, Local Wildlife Sites, nature reserves and priority habitats.</u>**

The proposal lies close to some of the richest habitats in Oxfordshire and neighbouring Buckinghamshire, the rare flower-rich floodplain meadows known technically as MG4 floodplain meadow. Less than 1500 ha of this habitat remains in the whole of the UK (https://www.field-studies-council.org/shop/publications/floodplain-meadows-guide/ and https://floodplainmeadows.org.uk/sites/default/files/resources/The%20conservation%20of%20floodplain%20meadows%20in%20the%20UK.pdf ) with Oxfordshire having some of the best remaining sites and having a major responsibility for the conservation of this rare habitat. The habitat is home to numerous rare plant species, as well as the curlew, an iconic and threatened wading bird, and numerous other species. Some very high quality examples of MG4 floodplain meadow exist in close proximity to the proposed development including those at Meadow Farm Local Wildlife Site/BBOWT nature reserve, less than 720m away, and Arncott Bridge SSSI/BBOWT nature reserve, less than 1900m away. We are greatly concerned about potential impact on these sites, including as a result of hydrological impact. The MG4 habitat is vulnerable to changes in both water quality and water quantity. There appears to be a risk that the development could lead to hydrological impact on these sites, as well as on Field by River Ray Local Wildlife Site (LWS) which is less than 1000m away and also includes species-rich wildflower meadows. Much more assessment is needed than is currently provided of this risk, and if the application is approved despite our concerns then long-term monitoring will be needed with amelioration works required should any impact be shown.

At present the assessment of these sites falls far short of what is needed. In particular, the Preliminary Ecological Appraisal does not include an assessment of impact on the numerous Local Wildlife Sites that are near to the proposed development site. Indeed, the ecological appraisal has omitted to list the numerous Local Wildlife Sites ("**LWSs**") close to the development site, or to make an assessment of impact for them, and to propose mitigation. These are serious omissions which must be addressed. Section 3.1 Protected Sites says near the top that "*national, regional and local sites within 2km"* were reviewed. However, no list of sites reviewed is provided. The only site included in Table 1 (which is titled statutory and non-statutory and so should include LWSs) is the nationally designated Arncott Bridge SSSI. There are numerous Local Wildlife Sites within 2km

which are not referred to even though the title of Table 1 indicates that they should be. The newly revised NPPF states:

*N6: Areas of particular importance for biodiversity and geodiversity*

*1. To support the conservation of important habitats, species and sites of geodiversity value, development proposals affecting:.....*

*c) A site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if:*
*i. There would not be a significant adverse effect on the integrity of the site; or*
*ii. The benefits of development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation.*

The previous NPPF, and Cherwell Local Plan policy, also include policy in relation to Local Wildlife Sites. Before this proposal is considered further there is an urgent need for the preliminary ecological appraisal to be rewritten to carry out an assessment of impact, and proposal of mitigation for all Local Wildlife Sites that could potentially be impacted, including at the very least all within 2km of the development site. See later in this response for matters relating to numerous other nearby Local Wildlife Sites, as well as ancient woodlands. Information on Local Wildlife Sites can be obtained from TVERC (Thames Valley Environmental Records Centre).

With respect to the floodplain meadow MG4 habitat, we consider, due to its exceptional rarity and the difficulty in re-creating it, that it meets the NPPF Glossary definition of an irreplaceable habitat and that the following NPPF policy also applies:

*"N6. 2. Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists."*

2) **Loss of rich on-site wildlife habitat, the consequent reduction in ecological connectivity in an area rich in wildlife, potential impact on nearby Local Wildlife Sites, and on species within them that may forage on the proposed development site.**

The development proposal is situated in the heart of an area greatly rich in wildlife. It also has high-quality wildlife habitat within its red line boundary, of value in itself, as a habitat for species residing within nearby Local Wildlife Sites, and in providing ecological connectivity between adjacent priority habitat and habitat in nearby ancient woodland and Local Wildlife Sites. The loss of any of the on-site habitat therefore impacts not only

on the wildlife using that habitat, but also on the ecological stability of habitats adjacent to it.

If this application is granted despite our concerns, it is vital that loss of existing wildlife habitat is minimised and that good quality on-site wildlife habitat is created as part of the development. The on-site habitat includes scrub and scrub mosaics, which are of value to a range of species, but particularly birds, invertebrates and reptiles. Detailed surveys are needed for these groups amongst other species. The above is not an exhaustive list and other detailed species surveys are likely to be needed. There is also good quality on-site grassland habitat. Mitigation will be needed for impacts which should include retaining as much habitat as possible, and creating habitat. The scrub mosaics are likely to be of particular value and it is important that this habitat is not converted to other habitats but is retained.

It is likely, considering the high wildlife value of many of the on-site habitats, that the site plays a key ecological connectivity role due to the site's location between:

a) the floodplain meadow sites to the north and north-west already mentioned above;

b) additional floodplain meadow and wet grassland sites in Buckinghamshire to the north-east and east that should also be included within an assessment (including Meadow complex south of A41, Ludgershall LWS/and in part a BBOWT reserve – about 1100m away, and Two Fields East of New Farm Barn LWS/BBOWT reserve – about 1600m away). Information on Buckinghamshire Local Wildlife Sites can be obtained from BMERC (Buckinghamshire and Milton Keynes Environmental Records Centre).

c) a large complex of multiple Local Wildlife Sites and ancient woodlands to the south-west of the site, some as close as 750m away. They are too numerous for us to set out in this response but we are concerned regarding potential impact on the sites, and impact on ecological connectivity. Both a full assessment and mitigation for impact are needed. For the numerous nearby Local Wildlife Sites to the south-west information can be obtained from TVERC. Ancient woodland information can be obtained from the Natural England "MAGIC" map.

Note that everything referred to in section 1 of this response regarding the omission in Table 1 of a listing, ecological assessment of impact, and mitigation proposals, of Local Wildlife Sites within 2km also applies in this section. Potential impacts on the sites include ecological connectivity losses, noise, lighting, hydrological impact and recreational impacts (for more on the latter see section 4 below). All these impacts and more should be assessed for each of the LWSs and ancient woodlands and mitigation proposed.

With respect to the LWSs, see the NPPF extract N6.1.c in section 1 above, and with respect to the ancient woodlands, see the NPPF extract N6.2 above for irreplaceable habitats.

3) **Impacts on the opportunity to create a large connected area for wildlife within the Reconnecting Bernwood Otmoor and the Ray project area, the Upper Ray Conservation Target Area ("CTA") and the Oxfordshire and Buckinghamshire LNRSs.**

The proposed development site lies directly adjacent to a CTA called the Ray CTA. Further details are available here: https://cdn.prod.website-files.com/681b687a2c2b3f7c0cdae986/681b687a2c2b3f7c0cdaeb79_Ray-CTA.pdf

It lies within the project area of the BBOWT led multiple partner project Reconnecting Bernwood, Otmoor and the Ray:

https://www.bbowt.org.uk/what-we-do/landscape-recovery/reconnecting-bernwood-otmoor-and-ray-rbor

It lies within the BBOWT Bernwood Forest and Upper Ray Living Landscape https://www.bbowt.org.uk/living-landscapes/bernwood-forest-and-ray-valley-living-landscape

And it also lies adjacent to multiple sections of the recovery and core zones of the Local Nature Recovery Strategy for Oxfordshire: https://www.oxfordshire.gov.uk/residents/environment-and-planning/lnrs/local-habitat-map

It is unusual for a development site to lie within or adjacent to such a wide range of ecological recovery projects and target areas. This is not a coincidence but testament to the exceptionally high existing wildlife value and potential future wildlife value of the local area around the proposed development. The development not only threatens existing wildlife but also the ability to meet the aspirations of multiple organisations and people for creating additional habitat in the area. Both through loss of wildlife and urbanising impacts including noise, lighting, hydrological and recreational impact.

If, despite our concerns, the application is approved, then it is essential that mitigation measures including minimising on-site habitat losses, and selection of appropriate habitats for creation both on-site and off-site are pursued, to minimise the negative impact on local ecological networks. The NPPF states:

*"N2 1. c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature*

*Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;"*

**4) <u>Recreational impact on nearby designated sites and priority habitats.</u>**

The above sections have already highlighted the potential for impact in numerous ways on nearby designated sites and priority habitats. This section deals specifically with the potential for recreational impact on the numerous LWSs and priority habitats that lie within 2km of the proposed development site. Any application that brings large numbers of people into close proximity to wildlife sites can lead to recreational impact due to disturbance, trampling and other reasons. This also applies to this application. Some of the documentation, such as the EIA Screening Direction Request refer to measures that could, although it does not specifically refer to them as such, reduce recreational impact on the many nearby Local Wildlife Sites and other designated sites. These include, in the EIA Screening Direction Request document:

- *"there will be a free shuttle bus providing safe access to local centres. This will be strongly promoted as the primary means of exiting the site. Appropriate mitigations will be in place to manage risks associated with limited pedestrian infrastructure, including encouraging safe movement and providing high-visibility clothing for SUs choosing to leave on foot."*
- *"Provide footpaths within the Site and open space; and"*
- *"The Site will have an activity co-ordinator, who will arrange a timetable of both educational and recreational activities including but not limited to: English classes, outdoor and indoor sports, board game sessions"*

However the details provided appear to be mostly limited to the above, and there is no documentation that we could find that assesses the specific issue of recreational impact on nearby wildlife sites. There is for example very little in the way of detail on the provision of on-site habitat that can be accessed. Full details of this are needed, including a management plan setting out how the habitat will be created and managed. Likewise, there is very little detail we could find on the frequency of the shuttle buses and on the information that will be provided to people leaving the site on foot. This is also needed.

And the detail needs to be provided in a manner such that all the provisions are guaranteed to be continued for the entire length of time that the development is operational.

Overall, we remain very concerned about the impact of the proposal on wildlife. The above measures are referred to lest the development still proceed despite our concerns.

We also observe that we consider the very short timeframe allowed to review documents and submit representations to be unreasonable given the potentially large impact of the project.

Yours faithfully,

[redacted]

Matthew Stanton
Director of External Affairs and Landscape Recovery

**From:** Oxfordshire
**To:** Crown Casework
**Cc:** [redacted]
**Subject:** Representation: 26/01833/CROWN (PCU/RARE/C3105/3378843)
**Date:** 17 September 2026 17:02:08
**Attachments:** image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
Consultee Response - 26-01833-CROWN.pdf

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

Good afternoon,

Please find our representation attached for the following application:

**Application:** 26/01833/CROWN

**Ref number:** PCU/RARE/C3105/3378843

**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.

**Address:** Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Best wishes,

Fenella Stacey
District Licensing Officer – Oxfordshire
**NatureSpace Partnership**
**e:** [redacted]
**m:** [redacted]
**w:** www.naturespaceuk.com
*Company operating hours: Monday to Thursday 09:00 - 17:00*

Langford Village
COMMUNITY ASSOCIATION
The Voice of the Village

Dear Secretary of State

**Re: Application reference: PCU/RARE/C3105/3378843**

**Site: Site A, MOB Bicester**

I write on behalf of Langford Village Community Association Bicester who represent 5,500 residents of Langford Village. We are an elected body to represent the community on topics which affect us.

We ask that planning permission be refused, on the following grounds:

- **Lack of Electricity and other utilities:**
  The application has demonstrated that there are many issues regarding the utilities for the site. Electricity is in short supply in Bicester currently, with power outages happening regularly across Bicester. (Confirmed with Bicester Electrical companies) Other large-scale developments e.g. Wretchwick Green, have been delayed due to lack of utilities capacity, in particular electricity. The application states generators will be used, that brings with it noise and pollution issues, which does not meet the standards required from an ecological perspective. The utilities required for 1,256 men plus staff are significant and have not been assessed in detail in the application, nor any permanent solution found for the electricity shortage.

  *"Due to the current uncertainties regarding available power within the network, the current proposal assumes that the existing electrical infrastructure cannot be relied upon, and therefore temporary and/or permanent generator provision shall be incorporated to support the development."*

- **Asbestos Present on site:**
  There is asbestos in the buildings, and require demolition before this project could realistically commence. This will make the project extremely expensive and with a longer timescale, due to the care required to remove the asbestos safely.

  *"The site is part of a former Defence Storage and Distribution Centre, known as Site A. The site was used as a large-scale military storage facility with Nissen huts and various warehouses. The majority of the existing buildings onsite, particularly the large warehouses, contain asbestos and are deemed to be dangerous, unstable structures and require demolition"*

- **Lack of Water Supply**:
  The plan recognises and comments on, that fresh water is an issue, for the development that is proposed. There is no indication of the quantity of fresh water required and the ability to obtain it. It will be a large amount for showers, toilets, clothes washing, cooking, washing up cleaning and drinking water. There is mention of bringing in tankers, this is not an acceptable solution for 10 years occupation and does not meet planning laws regarding a development.

  *"A site wide Mains water network is available and is currently in limited use. Record information implies that the Site Network is Private. Site Inspection suggests that the site network is of limited capacity relative to any concentrated development."*

- **Lack of Fire Risk Planning**:
  There are many gaps in the planning application regarding fire evacuation procedures, with no fire hydrants available on site, they would need to be installed

  "*Lack of Information 8.2 Space Separation Operation Nettlefire MOD015- RIBA 2 Fire Safety Strategy May 2026 | UK0045137.3823 Due to the current lack of information at this stage, accurate fire engineering judgements cannot be made for all buildings As the layout and height of individual buildings is currently unknown, space separation calculations are unable to be undertaken and therefore the requirements for spacing between buildings or the minimum unprotected area of building elevations is currently unknown."*

- **Ecology**
  The ecology report contained in the application is incomplete, there are many species in and around the site with many on the 'red list'. The lighting associated with the proposal will have a devastating impact on the local wildlife, (there are several rare species of bat), as the area will be lit 24hours a day.

  *"The site comprises areas of neutral grassland, hedgerows and scrub with several buildings and structures (including associated access roads). A brick reservoir, disused railway track and ditch are also present on site. The habitats on site have the potential to support several protected and notable species such as badger, hazel dormouse, water vole, breeding and nesting birds, Great Crested Newt (GCN), reptiles and notable invertebrates. The GLTA undertaken on site found 13 trees with features suitable to host roosting bats. Buildings on site were also considered suitable for roosting bats. The site is located within the SSSI impact zone for Arncott Bridge Meadows SSSI (located 1.82km from site). Consultation with Natural England may be required due to potential presence of impact pathways between the site and Arncott Bridge Meadows SSSI. Due to the presence of suitable habitats on site, targeted protected species surveys for hazel dormouse, breeding/nesting birds, Barn Owl, GCN, reptiles and terrestrial invertebrates are required. Pre-construction checks for water vole and badger are also recommended. Should works involve tree removal, or disturbance works within 20 m of trees identified as having bat roost potential or if works are likely to impact to suitable buildings on site, further bat surveys will be required to fully inform licensing and mitigation requirements. The site also offers high-foraging suitability for bats; therefore, activity surveys are recommended"*

- **Ground Contamination**:
  There are particular concerns that ground contamination has not been fully investigated. Previous land-quality work identified potential contamination issues, yet no borehole investigation has been carried out to resolve those risks.

- **Flooding high Risk**
  There are also significant flooding and drainage concerns. Parts of the site are at high risk of surface-water flooding and aspects of the drainage strategy remain unresolved.

- **Transport**
  The transport evidence also raises serious questions. The Transport Assessment repeatedly refers to the wrong road, while the B4011 serving the site has limited pedestrian infrastructure. Any residents would be at high risk as there are no pavements along the B4011 should they leave the site on foot

- **Isolated site**:
  The site is in a very isolated area and not in keeping with the small village it abuts (350 residents). The infrastructure is not adequate for such a large development.

The application states it is for 1,256 men who will spend an average of 90 days there, which would mean the population would turn over four times a year for 10years, making a total of 50,240 (1,256 x 4times annually x 10 years) during that period which is greater than the population of Bicester, all next to a village of 350

*Cherwell Local Plan 2011-2031 (CDC, 2015)*

*The CLP sets out the long-term spatial vision for the district and contains policies to help deliver the vision. The spatial vision for how CDC manages the growth of the district can be summarised as: • Focusing the bulk of the proposed growth in and around Bicester and Banbury.* ***• Limiting growth in our rural areas and directing it towards larger and more sustainable villages. • Aiming to strictly control development in open countryside***

- **Heritage:**
  There has been no proper on the ground surveys undertaken regarding any remains particularly Roman, of which there is a high probability

  *"There is considered to be a high potential for archaeological remains of Roman date to be present within the application site. The application site is located close to several known Roman sites: the Roman town of Alchester, approximately 7km west-north-west, the route of the Romano-British Akeman Street (approximately 2.4km north), and the large quantity of Samian Ware recovered during the construction of one of the warehouses on site in the early 1940s"*

- **Costs:**
  The costs to develop this site are immense, as it has never been an accommodation site, has there been a cost/ benefit analysis to turn this into an accommodation site?

- **Previous Application:**
  This site has also previously been considered for asylum accommodation. A smaller proposal was refused by an independent Planning Inspector before subsequently being cancelled. Nothing has changed since that application.

**Conclusion:**

Taking all these highlighted areas of the planning application together, we do not believe the applicant has demonstrated that Site A is a suitable location for a development of this scale, and would not pass under normal planning process.

We therefore respectfully request that planning permission be refused.

Yours faithfully,

Carole Hetherington
Chairman Langford Village Community Association – LVCA
[redacted]