Dear Crown Casework Team,

Re: PCU/RARE/C3105/3378843 / Cherwell District Council reference 26/01833/CROWN – MOD Bicester Site A

Executive summary

- The Preliminary Ecological Appraisal (PEA) supporting this application relies only on desk-study data from the Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC) and the NBN Atlas.
- However, the site sits within the area covered by the **Thames Valley Environmental Records Centre (TVERC)**. The PEA appears to not consult TVERC.
- A TVERC 2 km data search obtained independently shows a **materially different ecological baseline** from the one in the PEA. The PEA says there are no records across almost every species group but there are multiple records on TVERC.
- **Bats:** the PEA reports no bat records whereas TVERC shows **12 protected species within 2 km**, several within 1 km of the site, including a confidential record of the rare Bechstein's bat.
- **Great Crested Newt:** the PEA reports no records whereas TVERC shows a record effectively **on the application site** (at the Piddington Depot), a breeding cluster with juveniles roughly 350 m away, and mapped pond/wetland habitats in and around the site — corroborated independently by the applicant's own Drainage Design Statement, which documents on-site ponding, ditches and watercourses.
- Similar issues exist for **hazel dormouse, otter, polecat, badger, reptiles, amphibians, priority birds (66 species recorded vs the PEA's 25) and notable invertebrates** (133 Black Hairstreak and 161 Purple Emperor records).
- **Flora:** the PEA reports no records for protected or notable plants. TVERC shows **188 records across 29 species**, including two Red List species within 1 km of the site and a Nationally Rare sedge nearby — one of which also has its own dedicated species-recovery measure in the Oxfordshire Local Nature Recovery Strategy.
- The **Oxfordshire Local Nature Recovery Strategy** independently confirms this landscape's importance for the very species groups the PEA says are absent — including MOD Bicester's own recent habitat management work, which brought breeding Nightingale back to Oxfordshire after a two-to-three-decade absence.
- Natural England has twice (4 June and 23 July 2026) declined to close out its advice on **hydrological risk to Arncott Bridge Meadows SSSI**, and its most recent advice appears to rest on an account of the foul drainage strategy that is inconsistent with the applicant's own Drainage Design Statement. Natural England's recommendations are always made "on the basis of information provided". In this case the information provided to them appears significantly incomplete.

- An incomplete ecological baseline also undermines the **mandatory biodiversity net gain calculation** required for this application.
- **I am asking the Secretary of State not to determine this application on the current PEA**, and instead to require a corrected TVERC-based assessment, full protected-species surveys, and resolution of the outstanding hydrological questions and to re-consult Natural England before determination — refusing the application if this information cannot be provided in time.

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Introduction

I am writing to object to the proposed development on ecological grounds and, in particular, to raise serious concerns about the adequacy and accuracy of the ecological information submitted with the application.

The application is accompanied by a Preliminary Ecological Appraisal (PEA) dated May 2026.[1] The PEA states that its biological-records desk study covered a 2 km radius but identifies the data sources as the Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC) and the NBN Atlas.[1] It does not appear to have obtained records from the Thames Valley Environmental Records Centre (TVERC), despite the development site being in Oxfordshire and the great majority of the 2 km radius surrounding area (88%) falling within TVERC's recording area.

I undertook a TVERC biodiversity data search for Bicester Garrison (TVERC reference TVERC/26/0448, dated 3 September 2026), to obtain the information the PEA should have considered.[2] I performed a 2 km search and found numerous records which materially contradict the ecological baseline presented in the PEA. The documents comprising this data search are listed in the Appendix to this letter and are available on request; the records can also be independently verified by requesting a fresh search directly from TVERC (contact details are given in the Appendix).

The PEA states that "**the data search returned no records"** for Hazel Dormouse, Otter, Badger, Bats and Great Crested Newts.[1] Yet TVERC holds records within 2km

of the site for all these species and Polecat.[3] Of particular note, TVERC shows records for 12 bat species within 2 km (13 species within 5 km).[4]

The PEA states that "**the data search returned no records"** for Amphibians and Reptiles[1]. Yet TVERC holds records within 2km of the site for Common Frog, Common Toad, Palmate Newt, Smooth Newt, Common Lizard and Grass Snake.

The discrepancy extends to birds. The PEA reports records for 25 bird species, of which 8 are red-listed, whereas the TVERC data contains records for 66 species, of which 27 are red-listed.[1,2]

The extent of discrepancy between the records considered in the PEA and the records available is not a minor difference in the ecological evidence. It indicates that **the biological-records baseline informing the PEA was materially incomplete.**

1. Bats

Most significantly, while the PEA states there are no records for bats,[1] the TVERC data contains numerous records of protected bat species within the relevant search area, indicating that the wider area is of considerable importance for bats.[4]

These include:

- Barbastelle
- Bechstein's bat
- Brandt's bat
- Brown long-eared bat
- Common pipistrelle
- Daubenton's bat
- Eurasian serotine
- Leisler's bat
- Nathusius's pipistrelle
- Natterer's bat
- Noctule
- Soprano pipistrelle

From the TVERC records, my calculations indicate bat records in all directions around the site, at approximately:[4,5]

- 0.77 km from the centre of the development site (HMP Bullingdon: North) – Brown Long-eared Bat, Common Pipistrelle, Noctule, Soprano Pipistrelle;
- 1.00 km (HMP Bullingdon: South) – the same four species;
- 1.29 km (Upper Ray Meadows – Meadow Farm) – Brown Long-eared Bat;
- 1.35 km (confidential record location, held by Oxfordshire Bat Group) – Bechstein's Bat and Daubenton's Bat;
- 1.64 km (Piddington Wood) – Barbastelle;
- 1.85 km (St George's Barracks, Arncott Wood Road) – Common Pipistrelle, Noctule, Soprano Pipistrelle; and

- 1.94 km (13 Mill Lane, Arncott) – Barbastelle, Brandt's, Brown Long-eared, Common Pipistrelle, Daubenton's, Eurasian Serotine, Leisler's, Nathusius's Pipistrelle, Natterer's, Noctule and Soprano Pipistrelle.

These are approximate straight-line distances from the site centre as stated in the PEA (SP 63075 17817)[1] rather than measurements from the red-line boundary.

Of particular concern, these mapped records include rare woodland specialist species - Barbastelle to the west and south of the site and a confidential record of Bechstein's bat — one of the rarest and least-recorded bat species in Britain.[4]

This is highly material given that a woodland exists around the site boundaries and the PEA itself identifies trees and buildings on the development site with potential to support roosting bats and concludes that further nocturnal surveys may be required.[1]

The fact that the relevant environmental records were apparently not consulted appears to have **materially affected the baseline upon which the assessment and recommendations were based**. The TVERC records demonstrate that the surrounding landscape supports a substantial diversity of protected bat species and that the absence of bat records in the PEA cannot safely be relied upon as evidence of their absence — a limitation the PEA itself acknowledges in general terms.[1]

2. Great Crested Newts, and evidence of pond and wetland habitat capable of supporting them within the site

The TVERC data provides particularly compelling evidence concerning Great Crested Newt (*Triturus cristatus*).

A record within the site itself. The TVERC search returns an eDNA record of Great Crested Newt dated 13 August 2019, at grid reference SP635177, recorded at "Depot at Piddington, Oxfordshire."[3] When plotted on the TVERC webmap, this record falls within the mapped footprint of the Piddington Depot, which is the MOD Bicester Site A application site.[6] eDNA sampling is a standard, reliable method for confirming GCN presence in a waterbody and does not depend on the animal being seen. This is therefore a 2019 record of Great Crested Newt presence effectively on the application site itself.

A closely-grouped cluster approximately 350 m from the site. A second area of TVERC records sits at grid references SP6304317473 and SP6302217470 ("Land off Widnell Lane, Piddington, Bicester"), both approximately 350 m from the site centre.[3,4] The records at these two adjoining locations include:

Date	Recorded observation
12/05/2017	1 female + 4 juveniles
15/05/2017	1 male + 2 females; 2 males + 1 female
23/05/2017	1 female; 1 male + 1 female
01/06/2017	1 male + 1 female; 4 males + 2 females
12/06/2017	1 female; 2 males + 4 females

The presence of juveniles is direct evidence of successful breeding and recruitment within 350 m of the application site.[3]

Habitat within and immediately around the site capable of supporting GCN. TVERC provides a map of Section 41 Habitats of Principal Importance and this shows a mapped area of standing water (classified “Eutrophic standing waters”) within approximately 110m of the site centre — corresponding closely to the brick reservoir which the PEA itself confirms is present on the site[1] — together with mapped ponds and an area of lowland mixed deciduous woodland in the immediate vicinity, including at the Piddington Depot location itself.[2,6] These are precisely the kind of aquatic and terrestrial habitat features (open water for breeding, adjacent rough grassland and woodland for foraging and hibernation) on which GCN depend.

This is corroborated by the applicant’s own Drainage Design Statement,[7] prepared in support of this application. A site visit carried out for that report on 25 February 2026 recorded multiple open water features, ditches and watercourses within and adjacent to the site, and observed evidence of surface water flooding and ponding — including standing water in blocked drainage channels — even during dry weather.[7] The Statement also confirms the site sits above a Secondary A superficial aquifer, such that groundwater baseflow may potentially be supporting rivers, lakes and wetlands in the surrounding area, and records that infiltration drainage has been ruled out as unsuitable at this site due to underlying clay geology and the potential for high groundwater, meaning surface water will continue to be routed to on-site and adjacent ditches and watercourses.[7] The proposed drainage strategy also includes a new attenuation pond/basin for Phase 3A.[7] Taken together, this confirms — from the applicant’s own evidence base, independent of TVERC — that the site and its immediate surroundings contain, and will continue to contain, standing water features capable of supporting Great Crested Newt, and that any new water features created as part of the drainage strategy will need to be assessed and designed with the confirmed presence of GCN in the vicinity in mind.

Further evidence of breeding activity in the wider landscape. There is further evidence of breeding activity throughout the surrounding 2 km search area.[3] Examples include:

- SP62861909, approximately 0.95 km away – a Great Crested Newt larva recorded on 08/09/2016;
- SP62451645, approximately 1.27 km away – repeated records from 2014–2016 including eggs;
- SP622162, approximately 1.36 km away – multiple 2024 records including eggs and a juvenile;
- SP624164, approximately 1.36 km away – multiple 2024 records including eggs, adults and juveniles;
- SP620163, approximately 1.43 km away – repeated 2024 records including eggs and substantial adult counts;
- SP617162, approximately 1.83 km away – extensive 2024 breeding records including eggs, juveniles and observations of up to 10 males and 8 females in a single observation;
- SP62011613, approximately 1.75 km away – repeated records between 2013 and 2016, including observations of 33 adult males and 23 adult females on

13/05/2016 and 36 males and 8 females on 05/04/2016, together with recorded eggs and immatures;
- SP61871659, approximately 2.25 km away – repeated records between 2013 and 2016, including 11 males and 37 females on 23/05/2013, together with recorded eggs in 2015 and 2016.

The records should not, of course, be added together to produce a population estimate, because repeated observations may include the same animals. However, taken collectively they demonstrate widespread breeding activity, recruitment and substantial adult populations across a network of sites that surround the application site on all sides.[3]

Natural England's standing advice confirms that the presence of Great Crested Newts on or near a proposed development site is a material planning consideration and provides guidance on when surveys should be undertaken.[8]

This evidence makes the absence of Great Crested Newt records from the PEA particularly concerning. The PEA itself recommends a targeted Great Crested Newt survey.[1] The newly identified TVERC records — a 2019 eDNA record effectively on the application site, a closely-grouped breeding cluster with juveniles some 350 m away, mapped standing-water and woodland habitat within and immediately around the site, and the applicant's own confirmation of on-site ponding and watercourses — demonstrate why that survey cannot reasonably be treated as a precautionary exercise. **There is already clear evidence that Great Crested Newts are present on, or immediately adjacent to, the application site**.

3. Reptiles and other amphibians

The TVERC data also records:[3]

- three Common Lizard records, latest 2023;
- two Grass Snake records, latest 2022;
- Common Frog records through 2025;
- Common Toad records through 2025;
- Palmate Newt; and
- Smooth Newt.

The TVERC data also identifies Local Wildlife Sites in the immediate surrounding area which support these species. For example, Site B, Arncott has records of Common Toad, Palmate Newt, Smooth Newt, Common Frog and Great Crested Newt.[2]

4. The invertebrate baseline is also materially incomplete

The TVERC search records a number of notable and protected butterflies, including:[2,3]

- Black Hairstreak – Wildlife and Countryside Act Schedule 5, section 9(5)(a); England Red List Endangered;
- Purple Emperor – Wildlife and Countryside Act Schedule 5, section 9(5)(a);
- Small Blue – Wildlife and Countryside Act Schedule 5, section 9(5)(a);
- Dingy Skipper;
- White Admiral;
- Brown Hairstreak;
- Grizzled Skipper; and
- Small Heath.

Notably, the TVERC data includes 133 Black Hairstreak records, 161 Purple Emperor records and a record of Small Blue, amongst other species.[3]

The PEA nevertheless relies on its own limited desk-study baseline and recommends targeted terrestrial invertebrate survey work.[1] The failure to obtain the relevant Oxfordshire records therefore matters directly to the assessment of the site's ecological context and the scope of survey work required.

5. The desk study is also incomplete for protected and notable flora

The PEA states that the data search returned no records for protected or notable flora.[1] This, too, is contradicted by the TVERC data, which returns 188 records across 29 species of notable flowering plant within the 2 km search area.[3]

Two records sit within 1 km of the site:

- Field Mouse-ear (*Cerastium arvense*), England Red List Near Threatened, recorded in 2017 at Land off Widnell Lane, Piddington — the same location as the Great Crested Newt breeding cluster addressed in Section 2 above; and
- Ragged Robin (*Silene flos-cuculi*), England Red List Near Threatened, recorded in 2014 at Piddington Playing Field.

Further afield, the search area contains 40 records of True Fox-sedge (*Carex vulpina*) — a Section 41 priority species that is both Nationally Rare and Oxfordshire Scarce, and classified Vulnerable on both the England and Great Britain Red Lists — and 22 records of Tubular Water-dropwort (*Oenanthe fistulosa*), also Section 41 and Red List Vulnerable, both concentrated around a pond near Lower Arncott (approximately 0.8 km from the site) and at the Meadow Farm Meadows and Fields by River Ray Local Wildlife Sites addressed below.[3]

Devil's-bit Scabious (*Succisa pratensis*), England Red List Near Threatened, is recorded 16 times in the search area, most recently in 2025 at Meadow Farm Meadows approximately 1.2 km from the site.[3] This species is also the subject of a specific, mapped measure in the Oxfordshire Local Nature Recovery Strategy: Potential Measure 252, covering 163.4 ha within the 2 km search area, directed at supporting Devil's-bit Scabious in order to create conditions suitable for the reintroduction of Marsh Fritillary butterfly, a species lost from the county through habitat loss.[9] **This is the same pattern seen elsewhere in this letter: a species the PEA records as absent is not just present in TVERC records but**

independently confirmed, by a statutory county-level strategy, to be both present in the vicinity and a recognised local conservation priority.

Cornflower (*Centaurea cyanus*), a further Section 41 species, was recorded at Piddington Training Area in 2020, approximately 0.8 km from the site.[3]

As with the faunal records addressed above, the absence of any flora records from the PEA appears to result from the same failure to consult TVERC, rather than from any genuine absence of notable plant species from the vicinity of the site.

6. Local Wildlife Sites, ecological connectivity and the Oxfordshire Local Nature Recovery Strategy

The TVERC report identifies numerous Local Wildlife Sites and other ecologically important areas around the development site.[2]

Several are particularly close to the site. Using the grid references given by TVERC and the PEA's own stated site centre (SP 63075 17817), I calculate approximate straight-line distances of:[1,2]

- Piddington Training Area – approximately 0.83 km;
- Meadow Farm Meadows – approximately 1.21 km;
- Piddington Wood (part), a Cherwell District Wildlife Site – approximately 1.25 km;
- Piddington Wood, an Oxfordshire Local Wildlife Site in its own right (site code 61I01) – approximately 1.64 km; and
- Arncott Wood – approximately 1.82 km.

These are approximate distances from the site centre rather than distances from the red-line boundary.

The TVERC results describe these as species-rich grassland, wetland, ponds, woodland and scrub, and record protected and priority species including Great Crested Newt, Black Hairstreak, Purple Emperor, Brown Hairstreak, White-letter Hairstreak and a range of priority birds.[2]

This is further reinforced by the Oxfordshire Local Nature Recovery Strategy (LNRS), which TVERC has also supplied for this search area.[9] The LNRS maps the entirety of the 100m buffer immediately around the search area as an "Area that Could Become of particular importance for Biodiversity", and identifies mapped Potential Measures for woodland-specialist bats and for Blackthorn butterflies (Black and Brown Hairstreak) within that same 100m buffer, together with mapped Potential Measures for hazel dormouse and water vole within the wider 2km search area. All this is absent from the PEA.[9]

Of particular note, the LNRS records that breeding Nightingale had been absent from Oxfordshire for two to three decades until, following dedicated habitat management work carried out by MOD Bicester itself, Nightingale returned to breed in the county again around 2020.[9] These are Oxfordshire's only breeding pair of Nightingale and they live next to the site. This is independent, statutory confirmation that this landholding has recent, documented ecological value of national significance,

achieved through habitat management by the applicant's own estate — which sits very uneasily with a PEA that identifies no protected species on the same land.

The ecological significance and connectivity of the wider landscape therefore appears to have been materially understated by the PEA.

7. Natural England has already identified that the ecological information is insufficient, and the applicant's own drainage evidence confirms the hydrological uncertainty is unresolved

There is an additional and important issue concerning Natural England's advice, which is reinforced by the applicant's own supporting technical documents.

Natural England's letter of 4 June 2026, reference DAS/A024337, confirms that the development is approximately 1.8 km from Arncott Bridge Meadows SSSI and states that further information is required regarding the Bicester PEA Report in relation to this SSSI (where the Nightingale live).[10] Natural England specifically confirmed that it will need to be re-consulted with further information regarding hydrological impact pathways between the application site and the SSSI, in order to determine the significance of any impacts and the scope for mitigation.[10]

It is important to distinguish Natural England's statement that it "concurs" with the Habitats Regulations Assessment (HRA) screening conclusion from its separate advice on the PEA.[10] The former relates to the conclusion that significant effects on internationally protected wildlife sites were considered unlikely on the information provided at that time; it is not an endorsement of the completeness of the underlying biological-records baseline, which is the subject of this objection. If the HRA screening also did not consider the TVERC dataset, its conclusion may itself need to be revisited once the corrected ecological baseline is available, notwithstanding Natural England's concurrence to date.

Natural England has since written again, on 23 July 2026, again under reference DAS/A024337.[11] That letter states that Natural England's advice at that stage was based solely on "Email Correspondence of 16 July 2026", Natural England not having had sight of the drainage details themselves.[11] Natural England again confirmed that hydrological connection between the site and Arncott Bridge Meadows SSSI cannot be ruled out, and required the project to demonstrate that it will not alter the existing hydrological regime, including through the provision of "sufficient treatment trains" to prevent degradation of water quality affecting the SSSI's interest features.[11] The letter closes, once again, by asking to be re-consulted once that information has been obtained.[11]

That 23 July letter also records that Natural England had been told, via the 16 July email, that foul water "is anticipated" to be connected to the mains sewer.[11] This does not appear to be consistent with the applicant's own Drainage Design Statement, which sets out three possible approaches to foul drainage and states in terms that Approach 1 (connection to the municipal sewer) could not be confirmed as feasible within the RIBA Stage 2 programme, and that Approach 3 — construction of a new on-site wastewater treatment works discharging treated effluent to a watercourse — was the approach actually selected as the design basis, precisely

because the mains option could not yet be confirmed.[7] If foul water is in fact intended to be treated on site and discharged to a watercourse, that is a second and distinct potential pollution pathway to Arncott Bridge Meadows SSSI, in addition to the surface water pathway already identified, and one which Natural England does not appear to have been correctly advised of when giving its 23 July advice.

In other words, the applicant's own technical evidence submitted as part of the application appears to confirm that there is a hydrological pathway between the site and the surrounding watercourse network. This means the issue Natural England has now raised twice in relation to Arncott Bridge Meadows SSSI is not yet resolved. Natural England's most recent advice appears itself to have been based on an account of the foul drainage strategy that does not match the applicant's own design documentation.

Natural England must be reconsulted with a complete factual basis, before the Secretary of State can be satisfied that the ecological effects of the proposal have been adequately assessed.

8. The PEA itself identifies substantial outstanding survey requirements

The PEA's conclusions recommend targeted surveys for:[1]

- hazel dormouse;
- Barn Owl;
- breeding birds;
- Great Crested Newt;
- reptiles; and
- terrestrial invertebrates.

It also recommends pre-construction checks for badger and water vole and further nocturnal and/or aerial surveys where trees or buildings with bat roost potential may be affected.[1]

The report therefore does not purport to establish ecological absence. It identifies substantial uncertainty requiring further investigation. These surveys will take a minimum of 12 months to complete.

The need for surveys is vital given that the underlying biological-records search was incomplete, and, in the case of Great Crested Newt, that records exist effectively on the application site itself and immediately adjacent to it.

9. The application should not be determined on the present ecological evidence

The central issue is therefore not simply whether additional mitigation could eventually be secured by planning condition. The problem is that the information required to establish the ecological baseline and determine the likely effects of the

development is incomplete, and — on the applicant's own more recent drainage evidence — remains incomplete in relation to hydrology as well as ecology.

Biodiversity Net Gain: Under Schedule 7A to the Town and Country Planning Act 1990 (inserted by section 98 of, and Schedule 14 to, the Environment Act 2021), the grant of planning permission for development in England is, subject to exceptions, deemed to be subject to a biodiversity gain condition requiring a biodiversity gain plan demonstrating at least a 10% net gain in biodiversity value.[12] Government guidance confirms that applications made under the Crown Development route must be accompanied by the same biodiversity gain information that would be required on an application to the local planning authority, and are subject to this condition unless otherwise exempt.[13] Any biodiversity gain metric calculation for this site can only be as reliable as the habitat and species baseline that underpins it. An ecological baseline that omits recorded protected species and mapped priority habitat cannot support a sound biodiversity net gain assessment, independently of the concerns raised above about protected species licensing and survey.

The Secretary of State needs sufficient information: The Government's specific guidance for Crown Development and Urgent Crown Development [14] confirms that, when determining an application under the Urgent Crown Development route, the Secretary of State must take into account all relevant material planning matters, and that the applicant *must provide sufficient information to enable an informed planning judgement*. The guidance expressly provides that where there is insufficient information to enable an informed planning judgement, the Crown Casework Team may request further information from the applicant.[14] That requirement is especially important in this case because the expedited Crown procedure cannot reasonably justify making a decision on a materially incomplete ecological and hydrological baseline.

Conservation and Wildlife Law: I would also draw attention to the relevant legislative protections underpinning the species concerned: the Conservation of Habitats and Species Regulations 2017,[15] under which bats, Great Crested Newt, hazel dormouse and otter are European Protected Species, and regulation 43 of which makes it an offence to deliberately capture, injure, kill or disturb such species, or to damage or destroy a breeding site or resting place; the Wildlife and Countryside Act 1981, under which Great Crested Newt receives full protection under section 9,[16] and common lizard and grass snake are protected against intentional killing and injuring (section 9(1)) and against sale (section 9(5)), that protection having been extended to these widespread species by the Wildlife and Countryside Act 1981 (Variation of Schedules) Order 1988;[17] the Protection of Badgers Act 1992;[18] and the Natural Environment and Rural Communities Act 2006, sections 40 and 41, which place a biodiversity duty on the Secretary of State as a public authority exercising planning functions and identify habitats and species of principal importance, many of which are recorded in the TVERC data referred to above.[19]

Requests to the Secretary of State

I therefore respectfully request that the Secretary of State:

1. does not determine the application on the basis of the current PEA;

2. requires the applicant to commission and submit a corrected desk study using TVERC as the relevant Environmental Records Centre, in addition to any other relevant data sources;
3. requires the ecological assessment to be revised to incorporate the TVERC records and reassess the zone of influence, ecological constraints and likely effects of the development;
4. requires all necessary protected-species surveys to be undertaken at appropriate times of year *before determination*, rather than deferring essential baseline surveys until after permission;
5. requires the applicant to specifically address the significance of the TVERC bat records, including the records of Barbastelle, Bechstein's, Serotine, Nathusius's Pipistrelle, Noctule, Natterer's, Daubenton's and other protected species, and the presence of woodland bat corridors around the site;
6. requires the applicant to address the implications of the TVERC Great Crested Newt records, including the 2019 eDNA record within the application site, the closely-grouped breeding cluster with juveniles approximately 350 m away, the mapped standing water and woodland habitat within and around the site capable of supporting the species, and the extensive further evidence of breeding activity elsewhere within the 2 km search area;
7. requires the applicant to address the implications of the TVERC records of hazel dormouse, otter, badger, polecat, reptiles, amphibians, priority birds, protected/notable invertebrates and protected/notable flora;
8. requires the outstanding hydrological assessment relating to Arncott Bridge Meadows SSSI to be completed, having regard to the applicant's own Drainage Design Statement, which confirms that the surface water discharge pathway, outfall location and receiving watercourse are not yet resolved, and to the apparent inconsistency between that Statement's selected foul drainage approach and the account of foul drainage arrangements given to Natural England in its most recent (23 July 2026) advice;
9. re-consults Natural England on the revised ecological and hydrological information, on an accurate and consistent factual basis regarding both surface water and foul drainage arrangements, and including on whether the HRA screening conclusion remains sound once the corrected ecological baseline is available;
10. requires any revised biodiversity net gain baseline and metric calculation to be based on the corrected ecological data, and requires any new water features proposed as part of the drainage strategy (including the proposed Phase 3A attenuation pond) to be assessed and, if necessary, designed having regard to the confirmed presence of Great Crested Newt in the vicinity;
11. provides consultees and interested parties with a reasonable opportunity to comment on any revised ecological assessment; and
12. **if the necessary information cannot be provided in time to enable a lawful and properly informed decision, refuses the application rather than deferring fundamental ecological assessment to post-permission conditions.**

I would also ask that this representation is expressly brought to the attention of the Natural England officer dealing with the application and the relevant ecological

officers at Cherwell District Council and Oxfordshire County Council. I have copied this letter to the parties listed below.

In my view, given that the application makes no reference to these vital ecological records, it raises a serious question as to whether the threshold for an informed planning judgement has yet been met.[14]

This is therefore not simply a request for additional ecological mitigation. It is a request that the application be assessed against a complete and accurate ecological baseline before a decision is made.

I respectfully request that the application is therefore paused for the purposes of ecological assessment and consultation rather than determined on the present evidence.

Yours faithfully,

Dr. Claire Brenner

cc:

- Calum Miller MP, Bicester and Woodstock – calum.miller.mp@parliament.uk
- Natural England – consultations@naturalengland.org.uk
- Berks, Bucks & Oxon Wildlife Trust (BBOWT) – info@bbowt.org.uk
- Cherwell District Council – ecology@cherwell-dc.gov.uk
- Oxfordshire County Council, Nature Recovery Team
- Wrong Plan Wrong Site

Notes and References

1. Preliminary Ecological Appraisal, Project MOD015 (prepared for the Home Office, dated 13 May 2026), in particular pp.3 (site description and grid reference), 4 (desk study methodology and search radii), 8, 16–22 (results and protected/notable species), 23–33 (recommendations and conclusions). Available at: https://assets.publishing.service.gov.uk/media/6a915b6f9a177a1decf97b27/Preliminary_Ecology_Appraisal.pdf

2. Thames Valley Environmental Records Centre, *Biodiversity Report*, TVERC ref. TVERC/26/0448, Bicester Garrison, Launton Road, OX25 1AE, dated 3 September 2026 (Appendix, Document A1).

3. Thames Valley Environmental Records Centre, *Protected and Notable Species Records* (data export accompanying TVERC/26/0448), dated 3 September 2026 (Appendix, Document A4), and author's calculations from the grid references and easting/northing values it contains.

4. Thames Valley Environmental Records Centre, *Bats Records* (data export accompanying TVERC/26/0448), dated 3 September 2026 (Appendix,

Document A3), and author's calculations from the grid references and easting/northing values it contains.

5. Distances calculated by the author as straight-line (Euclidean) distances on the OS National Grid from the site centre stated in the PEA (SP 63075 17817) to the easting/northing of each TVERC record.

6. Thames Valley Environmental Records Centre, interactive biodiversity webmap accompanying TVERC/26/0448 (Appendix, Document A5), and single-taxon (bat) webmap accompanying TVERC/26/0448 (Appendix, Document A6).

7. Home Office, *Drainage Design Statement*, ref. ONF-15-RP-CV-100004 (Operation Nettlefire / MOD015), June 2026, in particular section 3.1 (p.8, no intrusive ground investigation undertaken), section 4.1 (pp.11–12, existing surface water drainage and site visit of 25 February 2026), section 5 (p.17, Secondary A aquifer), section 8.1–8.4 (pp.22–24, infiltration ruled out; Phase 3A attenuation pond/basin), and section 8.6 (p.26, Land Drainage Consent). Available at: https://assets.publishing.service.gov.uk/media/6a915c7b01bbff0bf8f97b4f/Drainage_Design_Statement.pdf

8. Natural England, Standing Advice for Great Crested Newt, available via gov.uk: https://www.gov.uk/guidance/great-crested-newts-surveys-and-mitigation-for-development-projects

9. Thames Valley Environmental Records Centre, *LNRS Report*, TVERC ref. TVERC/26/0448, Bicester Garrison, Launton Road, OX25 1AE, dated 3 September 2026 (Appendix, Document A2), in particular the Summary of Local Nature Recovery Areas (p.3), Potential Measure 243: bats (woodland specialists) (p.73), Potential Measure 252: Devil's-bit scabious (p.76), Potential Measure 245: hazel dormouse (p.80), Potential Measure 207: Nightingale (p.82), and Potential Measure 249: water vole (p.90).

10. Natural England, letter to the Home Office, ref. DAS/A024337, 4 June 2026. Available at: https://assets.publishing.service.gov.uk/media/6a9160a901bbff0bf8f97b5e/MOD_Bicester_Natural_England_letter_redacted.pdf

11. Natural England, further letter to the Home Office ref. DAS/A024337, 23 July 2026. Available at: https://assets.publishing.service.gov.uk/media/6a9160c901bbff0bf8f97b5f/MOD_Bicester_Drainage_Design_redacted.pdf

12. Environment Act 2021, c.30, s.98 and Sch.14, inserting new s.90A and Sch.7A into the Town and Country Planning Act 1990, c.8. See https://www.legislation.gov.uk/ukpga/2021/30/schedule/14/enacted

13. Ministry of Housing, Communities and Local Government, "Crown Development and Urgent Crown Development" (guidance), gov.uk, last updated 12 May 2025, paragraph "Does Biodiversity Net Gain apply to Crown

Development?" (Reference ID: 44-053-20250512). Available at: https://www.gov.uk/guidance/crown-development

14. Ministry of Housing, Communities and Local Government, "Crown Development and Urgent Crown Development" (guidance), gov.uk, last updated 12 May 2025, section "Urgent Crown Development", paragraph "What should an application under the Urgent Crown Development procedure contain?" (Reference ID: 44-057-20250512). Available at: https://www.gov.uk/guidance/crown-development. The procedure itself is set out in sections 293B–293C of the Town and Country Planning Act 1990, c.8 (as inserted by s.109 of the Levelling-up and Regeneration Act 2023, c.55) and the Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025, SI 2025/411.

15. Conservation of Habitats and Species Regulations 2017, SI 2017/1012, in particular reg.43 (offences) and Sch.2 (European protected species).

16. Wildlife and Countryside Act 1981, c.69, Sch.5 and s.9 (Great Crested Newt is listed in Sch.5 without qualification, engaging the full range of offences in s.9).

17. Wildlife and Countryside Act 1981 (Variation of Schedules) Order 1988, SI 1988/288, art.2(4), which extended the protection in s.9(1) of the 1981 Act (so far as it relates to killing and injuring) to the viviparous (common) lizard, slow-worm and grass snake, which had previously been listed in Sch.5 in respect of s.9(5) (sale) only.

18. Protection of Badgers Act 1992, c.51.

19. Natural Environment and Rural Communities Act 2006, c.16, ss.40–41.

Appendix: TVERC data search TVERC/26/0448 (documents relied upon)

The following documents, all forming part of the same TVERC data search (TVERC reference TVERC/26/0448, Bicester Garrison, Launton Road, OX25 1AE, dated 3 September 2026), are relied upon throughout this letter:

- **A1.** Biodiversity Report (PDF) — summary tables of legally protected and notable species, invasive/non-native species, bat records, designated wildlife site citations, and Section 41 habitat mapping within the 2 km search area.
- **A2.** LNRS Report (PDF) — Oxfordshire Local Nature Recovery Strategy mapping and Potential Measures for the same search area.
- **A3.** Bats Records (CSV) — full record-level export of bat records within the search area, including grid references, dates and species.
- **A4.** Protected and Notable Species Records (CSV) — full record-level export of protected and notable species records (excluding bats) within the search area.
- **A5.** Interactive biodiversity webmap (HTML) — the multi-taxon web map underlying the Biodiversity Report, including designated site boundaries, Section 41 habitat polygons and the search-area marker.
- **A6.** Single-taxon (bat) webmap (HTML) — the equivalent web map for bat records specifically, covering the wider 5 km bat search radius.

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Alternatively, I can supply copies of the documents listed above under the terms permitted by TVERC (data provided to a Local Authority in connection with a live application, and reports presented to consultees, being expressly excepted from the restriction on third-party disclosure).