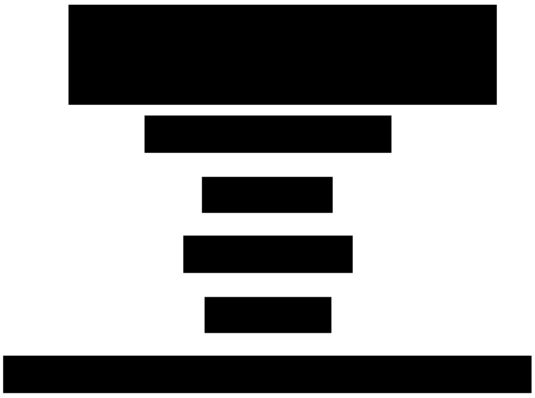


Crown Development Casework Unit

16th September 2026

Your reference PCU/RARE/C3105/337884

Dear Sir/Madam

RE: Formal Objection to application PCU/RARE/C3105/337884 Asylum Centre A Site MOD Bicester.

Please accept this letter as my formal written objection to the Planned Crown Development at A site MOD Bicester.

I can confirm I am and have been a local [redacted] resident for much of my life.

My objections relate to the lack of specific data relating to the vast and varied ecology of the site and the protected species, especially the presence of bats and the inadequate mitigation measures included by the applicant in the application.

I have been working under the guidance of an experienced Ecologist of twenty years, [redacted] BSc Hons Ecology, and local Ornithologist [redacted]. We have undertaken several bat surveys, using the survey techniques laid down in the Bat Conservation Trust's Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016). These took place on Monday 7th September at 19.00-21.00 and Thursday 10th September 2026 at 19.30-21.30 . We have logged and recorded five bat species including the rare Barbastelle bat, emerging from the buildings on A Site in locations SP6278417492, SP6327117937 and SP6296918107. I have presented our findings to the Bat Conservation Trust for documenting.

Other species documented and recorded: Noctule, Pipistrelle (45), Greater Horseshoe, Brown Long Eared.

I have video audio footage of the Barbastelle bat taken on 10 September 2026 which has been uploaded with the main Piddington Parish Council Objection documents. It is a large file, if you require this evidence, I am happy to supply this to you. I have emailed and reported the presence of this bat at A site MOD Bicester, to Natural England and the Bat Conservation Trust on 16 September 2026.

Barbastelle bats are one of the rarest mammals in the Uk, it is of national and international importance, strictly protected under annex two of the European Habitats Directive (EPS) and listed on the vulnerable Red List species.

I **object** to the urgent proposal being passed by the Crown Development Casework Group on the grounds that:

1. We have documented evidence this Barbastelle Bats exists on A Site.
2. A "walkthrough" Preliminary Roost Assessment was undertaken by the applicant's consultants in March/April 2026, aiding the compilation of PEA, noted the potential for bats, but did not locate any bats on the site. The applicant failed to use the correct baseline data from the TVERC.
3. No seasonal surveys including bat emergence and re-entry (should be undertaken May-August), bat activity transect and static (April-October) and hibernation (November-March). I conclude the survey work was inadequate to make a full assessment of the bat status of the site.
4. The presence of bats at the site means the Urgent Cown Development cannot override the Conservation of Habitats and Species Regulations 2017 (as amended), and The Wildlife and Countryside Act 1981 (as amended).

The rest of the document relates to further objections I wish to raise regarding the site's unsuitability because of the presence of bats.

I have based my objections on the decision by the Home Secretary on the 26th August 2026 to issue an official EIA Screening Directive for a Schedule 2 Development, concluding that the project does not require an Environmental Impact Statement localised environmental impact did not trigger the threshold required for a full statutory EIA.

I wish to challenge this decision with the objections I will expand on below.

It is my understanding that a Preliminary Ecological Appraisal (PEA) was undertaken between the 26th March and the 10th April 2026, which included an Extended Phase 1 Habitat Survey and identification of potential habitats to support protected species. A desk study including a data search of the MAGIC database, a review of data obtained from Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC) and a review of historic surveys undertaken nearby, were conducted.

Preliminary Ecological Appraisal Area is in Oxfordshire, not Buckinghamshire and the data should have been gathered from the Thames Valley Environmental Records Centre TVERC in Oxford.

Objection 1. Using Incorrect Data

It is my understanding that the Chartered Institute of Ecology and Environmental Management, CIEEM, outlines strict guidelines for accessing biodiversity data. The rules state that a background study must always include the complied data and records from the local environmental records centre, in this case the TVERC. I will refer to this mistake in the application throughout this letter of objection. This omission in the application leads to an incomplete wildlife picture and directly risks producing inaccurate data essential in this application. By not incorporating the TVERC data, the consultants employed by the Home Office proceeded without the long-term historical records relating to the protected species including bats, reptiles, and Greater Crested Newts (GCN0, known to inhabit the surrounding local area. I would point out this oversight has oversimplified the PEA's findings, allowing the Home Secretary to issue an official EIA Screening Directive, based on flawed incomplete ecological assessments. This could lead to the increased potential biodiversity loss harm and inappropriate or insufficient mitigation.

To illustrate this point, data was submitted that bats were not found on the site, or in a 2km radius, yet bats were discovered in 2015 at Graven Hill a former disused MOD site forming , part of MOD

Bicester, which is less than 2.4km. They included the Long-Eared Brown , Pipistelle and the extremely rare Barbastelle.

Objection 2 Incomplete and Poorly Timed PEA Survey, the effects on Official Policy Documents and Decision Making.

Bats are unique mammals and they play a vital role in our environment. A thriving bat population is an indicator of a successful ecosystem, but during the last century bat populations have suffered huge reductions in their natural habitats leading to severe population declines, hence the need for legal protection. Irrespective of whether a planning consent is needed or not, the laws protecting bats still apply. The number of artificial roost sites for bats has increased in the form of buildings and their roosts are protected by law and should be considered during the planning process, and the roost is protected whether bats are present in it or not. An evaluation of the site will enable the qualified ecologist to determine the presence of any Key Habitats or Supporting Habitats for bats. A report will detail the relative conservation importance of each habitat feature to bats, including the roost-supporting potential of any built structures or trees. The ecologist's evaluation of the individual features will depend on the specific combination of contributing factors about the site, including:

• The conservation status of species likely to be present

• Geographic location

• Type of bat activity likely (breeding, hibernating, night roosting, foraging)

• Habitat quality

• Habitat connectivity off-site

• The presence of nearby bat populations or protected sites for bats (usually identified in a desk study). The whereabouts of these habitats should be set out on a plan of the site or as an Ecological Constraints and Opportunities Plan (ECOP). The ECOP can then be used to help guide the design of the project.

Yet it appears during the survey undertaken by the applicant was a walk about during the period 26 March until April 4, 2026. The Home Office consultants only found the potential for bats and their roosts, but no actual bats. No further investigations were conducted, yet a roost is protected whether it is occupied or not. Surveys should be undertaken at separate times during the bats active season (May - September) and should also involve the use of automated bat detectors left on site for a period of several days. Any buildings with bat roost potential which may be impacted by works with disturbing activities would require further nocturnal emergence and re-entry surveys to map exactly where these species fly and should encompass acoustic tracking. Under the British Standards BS4202-2013 guidelines (Biodiversity Code of Practice Planning and Development), applicants are required to submit high quality, scientifically robust and transparent ecological data to support a planning application.

England's National Planning Policy Framework (NPPF, July 2021, Para 180(a). The NPPG describes how authorities and applicants should consider whether a development has potential to cause an impact on protected sites, species, or on ecosystems. In Particular" the NPPG notes in the environmental chapter planning decisions must be informed by robust and up to date ecological evidence to establish a reliable baseline, and: "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts),

adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused."

Getting the right information at the right stage of the planning process is critical. The Government Circular 05/2006 (ODPM 2005) states that "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision".

This application fails to record the information required by the BS 42020-2003, Circular 05/2006 (ODPM 2005), and the (NPPF, July 2021, Para 180(a). The application violates the NPPG's operating principles regarding evidence gathering before designing mitigation layouts. To further illustrate my point, without any seasonal tracking of bat flight corridors the applicant cannot prove compliance with the Institute of Lighting Professionals ILPGN08/23 light pollution standards and so will be unable to secure a European Protected Species Mitigation Licence EPSML, (degradation licence) from Natural England.

I would argue, because of the lack of appropriate seasonal surveys, and that baseline data from TVERC was not considered, the PEA has falsely painted the landscape as empty of bats, so no further surveys were undertaken and many of the mitigations proposed for bats such as lighting and buffer strategies are functionally blind and inappropriate. Yet the intrusive nature and large scale of the development at A Site MOD Bicester necessitate the need for all relevant surveys to be conducted correctly before a change of use planning application can be granted by the Crown Development Authority.

Using anything less than up to date, robust and transparent data to assess this application would be a traitorous act towards the bat's population residing in A Site, and make a mockery of the laws, statutes and regulations established to avoid such a situation.

I also noted that ongoing bat surveys specifically designed to study changes in bat behaviour have not been included in the proposal. The Home Office has argued that its proposed static mitigation methods such as the 10-15 metre buffer and installing downward facing LEDs are sufficient to bypass the need for long term ecological tracking. I oppose this omission. If ongoing bat surveys are not undertaken the government will have no way of knowing if its lighting restrictions and mitigation methods are working, or if the local bat populations are quietly driven to extinction. Biodiversity Net Gain although not applicable to this Crown Development Proposal, would certainly be in a negative position.

Objection 3. Bats and the Law

Individual bats are protected from 'intentional' or 'reckless' disturbance under the Wildlife and Countryside Act 1981 (as amended). England and Wales, and The Conservation of Habitats and Species Regulations 2017 (as amended), The international protection (the European Commission (EC) Habitats Directive) has been transposed into national laws by means of the Conservation of Habitats and Species Regulations 2017 (England and Wales) as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended). Biodiversity Code of Practice for Planning and Development BS 42020-2013.

The applicant will be aware that it is illegal to kill, injure, capture or cause disturbance that affects bats, obstructs accesses to bat roofs, or damages or destroys bat roosts, and the Wildlife and

Countryside act 1981 (as amended) protects all bats from either intentional or reckless disturbance. As a simple example the lighting proposed at A site, in the vicinity of the bat roosts could constitute an offence since it causes disturbance and potential abandonment of the roost, or non-emergence it leading to entombment and death.

It is my opinion that the applicant's proposal to begin clearing, demolishing exiting building and transporting the "pods" on to the site before further ecological surveys (as outlined above), and subsequent data analysis, would be an absolute offence causing irrevocable damage or destruction to bats or their roost sites and will directly contravene the Wildlife and Countryside Act 1981 (as amended). England and Wales.

As the proposed activity in the application cannot take place without contravening the law, then a valid **derogation license or European protected species mitigation licence (EPSML**) will need to be applied for with Natural England the relevant Statutory Nature Conservation Body, once change of use planning permission is granted. The applicant must legally prove that the development will not harm the favourable conservation status of the local species. It is an offence not to comply with the terms of the license. The license will include legally binding measures to avoid harm to bats, avoidance of disturbance at sensitive times and to provide suitable habitats for them into the future.

It is accepted that work cannot commence until this license as been granted. I raise the important point that this license **cannot be granted to the applicant** by Natural England because the applicants' submissions do not fulfil the legal criteria and are built on structurally deficient data regarding the areas actual bat wildlife. The applicant **must** supply the authority NE, with the appropriate high quality, scientifically robust and transparent ecological data from the surveys listed above, and the data gathered from the local environmental records centre TVERC, before a license should be considered. I make refence to : The HO consultants have stated even with their limited data at this stage "that light pollution from the site, even if low light LEDs are used will have a detrimental effect on the bat population."

Objection 4. Lack of Biodiversity Net Gain BNG

I understand that this application as an Urgent Crown Development is fully exempt from a BNG requirement. I would therefore challenge the **urgent** need for this Development given the lead time from November 2025, when this site was first considered. The Biodiversity Duty (S.40 and S.41 of the NERC Act, 2006), this duty has been recently strengthened through the Environment Act (2021)), and May 2023 UK Government guidance (newly strengthened Biodiversity Duty) and I strongly object to the fact that BNG has been omitted from the application.at a BNG is appropriate an essential requirement is appropriate in this case.

I suggest that the Home Office has not legally constituted conserving and enhancing biodiversity fully under the updated NERC act. Section 40, places a strict statutory biodiversity duty on all public authorities including the Home Office, and Section 41 the priority species habitat requires the Secretary of State to maintain a legally designated list of living organisms and habitat types that are of principal importance for conserving biodiversity, including bats which are explicitly protected under this section. Consequently, the Home Office has an enhanced legal obligation to ensure the bats habitats are not degraded by construction dust, diesel soot, or artificial light pollution.

As this act embeds nature conservation into institutional level of public decision making, it establishes the need for a project to consider the impact on habitats as a primary material concern and forces the government to actively look for opportunities to conserve and enhance biodiversity in the exercise of their functions. However, by pushing the crown development through via the urgent

crown development application, the PEA based on a single visit preliminary walkover survey treats biodiversity as a box tick exercise rather than a core consideration.

Furthermore, the Home Office cannot fulfil a legal duty to enhance biodiversity if it fails to accurately establish what biodiversity already exists on the site, because of the points relating to data capture already raised in this objection letter. It is unjust for the Home Office to use the urgency clause to escape the exacting environmental standards imposed on other local residents and commercial developers. To illustrate this point, development on the former MOD Bicester, at D Site Graven hill, were legally bound by planning conditions to implement strict habitat creation plans and deliver mandatory biodiversity gains.

Objection 5 EIA Screen Document Issues Raised

The PEA report highlights disturbances to the local ecology will occur due to the works including external light and noise pollution, permanent habitat loss and fragmentation, reduced commuting and foraging corridors, potential pollution risks, and habitat degradation. Furthermore, HO consultants have recommended further investigations into these impacts are required.

As an EIA will not be undertake the Construction environmental management plan CEMP becomes the primary legal framework.

The CEMP details the specific on ground protocols including dust suppression to reduce the impact on wildlife ecological protection.

I object to the current CEMP as this plan is structurally flawed as the baseline data used to design it was restricted and excluded the TVERC data. The protocols listed in the CEMP do not protect the actual species present. For example, how can the CEMP effectively dictate a seasonal pause for a rare bat maternity colony if the if the ecologist did not log that colony existed in the first place.

Objection 6 The Damaging effects of Light Pollution on the Resident Bat Pollution in A site from the Application

Legal

This is a complex topic, and full ecology surveys are required to determine what bat species are present, how they use the site, and the varying species responses before any application can be made. As previously stated, this has not been achieved. A Site is currently a mostly dark decommissioned military asset, and it serves as an undisputed disturbed nocturnal sanctuary and flight corridor. However, converting it to accommodate up to 1256 service users plus staff requires a massive injection of artificial lighting for site operations, perimeter security, and pedestrian safety, which will cause a huge and disturbance to the bat population already residing at the site.

Taking an appropriately proportional approach to assessing lighting impacts on the bats, the British Standard BS 42020:2013 Clause 5.5, states that “The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development”. Yet this has not been undertaken and the Home Office Consultants’ note that the current scheme design does not include details of lighting provision, and the co-ordination of lighting and controls strategy will be assessed during RIBA 3 as it was not possible at RIBA 2, therefore impacts from operational lighting are unknown”. The Royal Institute of British Architect RIBA dictates when environmental lighting details must be legally integrated into the design. I must object to this disconnect between the early design phases and the

strict requirements under architectural planning guidelines which need to comply with BS4202 0-2013 code of practise. Comprehensive ecological data must be fully gathered and integrated during RIBA stage 2 (concept and stage 3 spatial coordination). This ensures that any physical dimensions our custom designed around the wildlife constraints found on the site.

By not including the lighting provisions at stage 2, I would conclude that the Home Office are retroactively trying to fit complex wildlife protections into the latter stages of the development plan without the required local data. Therefore, the application fails to meet the standard required under BS402 O 2013.

25 Year Environment Plan (01/2018), under this directive the UK Government made a commitment to effectively manage light pollution. A fundamental principal to control light pollution, is the application of the 'mitigation hierarchy.' This is operated through England's National Planning Policy Framework (NPPF, July 2021, Para 180(a) "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused". I would urge the Crown Development Authority to consider this in their decision-making process regarding this application.

The NPPF sets out how the effects of lighting should be considered in the planning system. Paragraph 180.c directs that policies and decisions must ensure new developments are appropriate for their location by considering, and limiting, the effects, including cumulative effects, of artificial light pollution on the natural environment. The NPPF draws particular attention to potential for light pollution to cause impacts on 'intrinsically dark landscapes' such as A Site and on 'nature conservation.' The NPPG describes how applicants should consider whether a development has potential to cause an impact on protected species.

In Particular" the NPPG notes in the environmental chapter state, planning decisions must be informed by robust and up to date ecological evidence to establish a reliable baseline. "Lighting schemes or intrinsically dark landscapes need to be carefully assessed as to their necessity and degree." As the Home Office failed to consult the local records centre directly, this breaches this British standard, you cannot construct a valid scientific and sound BS 42020 lighting mitigation strategy without knowing exactly which light sensitive species are on site. In parallel, opportunities to design lighting betterment for biodiversity should be sought wherever possible.

The NPPG mandates that that decision makers must evaluate whether a project introduces new light into a dark landscape where new lighting would be conspicuously out of keeping with local nocturnal light levels. As previously stated, A Site, is an old military depot, acting as a de facto dark site, introducing high-intensity security lighting and light spill from modular windows housing the 1256 SU will radically alter the ambient nocturnal baseline. This fails to satisfy the NPPG's advice to minimise light in naturally dark rural settings. On this point I object to the planning application and conclude that A Site is unsuitable for the proposed development.

NPPG mandates that planners are encouraged to use dimming regimes and strict curfews, to avoid harmful light pollution in previously dark areas. As the application is for a facility designed for high residential occupancy and security use continuous perimeter illumination will be required for safety and security reason. These fixed security demands make it impossible for the applicant to implement nocturnal dark curfews that local bat flight lines legally require to function successfully.

The NPPG also establishes clear principles that regulate internal light spillage through windows of which there will be many on the site accommodating the 1256 service users. Where internal light

spills through a building's envelope it is classified as obtrusive light meaning it escapes into areas where it is not wanted. I wish to note here that these modular pods feature numerous unshielded windows which face directly towards the dark boundary hedgerows or bat flight paths the internal light escaping outwards will violate the NPPG's mandate to restrict nonfunctional obtrusive light causing issues with bats flight path and foraging opportunities.

As there is very little known about how the site will operate, we do not know if the government intends to use intelligent controls and temporal limits for integrated curfews and internal controls to minimise light when a site transitions into late night hours to avoid internal spillage. The mandate ruling from the NPPG states that internal spaces which are active during peak nocturnal wildlife hours and rely on occupants to manually pull blinds or draw curtains is not acceptable as an effective mitigation strategy. The plans must feature build wide controls such as automated blackout blinds tied to astronomical timers or internal motion sensors that automatically switch off communal internal room lighting when spaces are unoccupied at night. As this is unknown at the time I wish to object to the development on light pollution grounds and the detrimental effects this will have on the bat population.

The institute of lighting professionals ILP Guidance note GN 08/23. This guidance note considers bats foraging roosting and commuting needs in a greater planning context. I **object** to the application under the point that the applicant has not fully applied the rigorous baseline standards required by the GN 08/23 directive.

This directive states that a lighting plan must be designed in direct collaboration with an ecologist who has mapped out the exact species present. This is because light adverse bats like the Long Brown Eared bats found on A Site, require total darkness, whereas faster bats can tolerate some dimmed lighting and mitigation schemes are based on precise data. The Home Office have also failed to complete seasonal flight corridor surveys a requirement of the GN 08/23. The site ecologist must create a lawful mitigation map. The applicant must survey the site across different seasons to identify the exact dark commuting corridors. The Home Office have relied upon a brief visit end of March beginning the of April2026 to establish the preliminary ecological appraisal without multi-season tracking and their proposed buffer zones are based on guesswork rather than proven flight paths. If work goes ahead this Autunm 2026 it will be too late to undertake seasonal surveys as the bat population will already be seriously affected by ALAN.

Artificial light at Night, Alan

This a major threat to bats, heavily disrupting their survival, reproduction, and feeding habits. Bats are strictly nocturnal mammals adapted to darkness, artificial lights therefore function as a severe physical and behavioural barrier.

Alan can lead to entombment and roost abandonment. I **Object** to the application on the grounds that light pollution will have a severe detrimental effect on the bat population at the site.

1. **delayed emergence** bats monitor natural light levels from within their roosts to know when night has fallen. If artificial light shines directly onto the roost exit such as on building A6 on A site Bats will misjudge the time and delay leaving. Lighting a roost would be deemed an obstruction under legal protection.
2. **Starvation and trapping** missing the first hour after sunset means missing the peak abundance of prey if light remains consistently bright Bats may refuse to leave entirely and effectively becoming entombed inside the roost where they eventually starve or abandon the

site permanently. Those who do leave have reduced feeding time and thus reduced growth rates and starvation of young occurs.

3. **Fragmentation of commuting routes**
   The invisible wall effect. Many bat species travel along continuous dark corridors such as hedgerows and tree lines, a bright security light piercing a dark corridor can create an impassable barrier.
4. **Energy depletion**
   Instead of crossing a lit area bats will fly long exhausting detours to bypass the light expending critical energy reserves required for breeding and pup rearing.
5. **Disruption of foraging ecosystems**
   The vacuum cleaner effect. Bright UV lights act like an ecological vacuum attracting nocturnal insects, this leads to a competition imbalance. The fast-flying Pipistrelles found at A Site (light opportunistic) will exploit this feeding directly under the lights. However, the slower flying (light adverse) Long Brown Eared or Greater Horseshoe and Barbastelles will completely avoid these light bubbles. This reduces food quality and can starves the rarer flying slow flying bats of food, leading to reduced reproduction rates. This exposing the fast-flying bats to the elevated risks of predation from Owls and Hawks.

   It is noticeable that one of Britain's rarest bats the Barbastelle is among those species recorded as avoiding ALAN. ALAN has potentially devastating conservation consequences for these species on A Site given the amount of uncontrollable ALAN this development will cause. The Home Office consultants raised the point that ALAN will pose a significant issue.

6. **Suppression of drinking habits**
   Artificial lighting suppresses a bat's drinking behaviour even more severely than its hunting behaviour. Slower-flying species will completely abandon open water troughs or ponds if white light spills onto the surface cutting them off from vital hydration.
7. **Severing a flightpath**
   The associated flightpath to and from the access point is as valuable, as the roost itself. Severing a key flightpath some distance from the roost could cause desertion, and this loss of a roosting site could constitute an offence under the legislation.

Any cumulative impacts from ALAN are likely to be negative to the bats Favourable Conservation Status (FCS). Studies show that even species known to display some light opportunistic behaviours can be detrimentally impacted by ALAN, and that it is a complicated picture requiring knowledge gathered at a site level to make accurate predictions of impact. This work emphasises the importance of always completing analysis of bat survey data past guild level to species level to understand how species are impacted at a particular site.

<u>Light Mitigation</u>

A **buffer zone** can only be calculated according to the species present and the level of usage. Buffer zones can vary by tens of metres, and as unattenuated light spill is predicted at A Site they will be vital to the design of the project. Yet the Home Office completely skipped using the TVERC baseline data and buffer zones were drawn using a single visit walkover. I wish to without multi seasonal tracking. I wish to **Object** to the applicants' design of a standard 10 -15 metre buffer corridor as this is arbitrary guess and may fail to shield the actual roosting areas and flight paths of the rare species

like the Barbastelle bat. As different species of bat react to light differently the wrong mitigation for the wrong bats it evident in the plan. Slower flying light shy bats (light Adverse) like the Brown Long Eared are incredibly sensitive and will abandon a corridor with even minimal light spill.

Tree planting to reduce the light pollution, I appreciate that the proposal incorporates the preservation of existing tree blocks and targets native tree planting to help mitigate light pollution as these trees will form a photometric buffer.

But I must raise an **objection** to plan regarding tree planting, as there are distinct functional limitations during the winter defoliation gap, if standard deciduous trees are planted. they will drop their leaves in the autumn when the nights are at their longest and the internal lighting usage peaks. The bare branches will lose over 60% of their light blocking capacity. The growth timeline of saplings planted during initial construction will take 5 to 10 years to develop a dense canopy and some sampling will die back and may not be replaced, which reduces the capability of the canopy to intercept sufficient light spill. As the site is for a temporary 10-year change of use, the newly planted trees will only provide effective light mitigation towards the end of the project's lifespan.

A further **objection** to the application is the proposed tree planting may not be sufficient to shield the rare and on the Red Protected Species List, Barbastelle bats, which typically require a much deeper multi layered forest buffer.

Central Management System CMS for Light has not been included in this application. This is a gap in the ILP GN 08/23 guidelines. A major development such as the proposal at A Site, which is adjacent to a sensitive bat habitat is expected to integrate intelligent controls. The proposal is relying on fixed wattage external safety LEDs that maintain a uniform brightness throughout the night rather than considering dimming down during peak bat emergency hours by 50 to 70%. Presently the current plan relies primarily on physical shields rather than smart scheduling.

I **Object** to the use of A Site in this application, on the grounds that the proposed high residential occupancy of 1256 SU, 24/7 activity, and LED lit security perimeter, with fixed lighting array and no PIR sensors, cannot adapt to seasonal wildlife activity without the automated flexible dark curfews. Therefore, the site is totally unsuited to be located within an area housing bats as the light pollution will inevitably spill into the neighbouring bat flight corridors and cause the bats harm.

PIR Sensors, I appreciate that PIR sensors will be part of the application, however the need for security at the site will dictate that the main perimeter fence line, vehicle access roads, and core communal avenues will require continuous high visibility illumination for the CCTV to work correctly. As a result, the most powerful lights on the site cannot be put on motion sensors and must remain constantly on, bypassing localised PIR dimming and causing light spillage into what was an intrinsically dark landscape.

PIR sensors can be triggered by moving mammals or branches as well as people. As the site will house 1256 service users capable of moving through these communal corridors 24/7, combined with natural triggers as discussed earlier, the PIR sensors will be continuously re-triggered throughout the night. If the timer is set to even a brief one-minute window this could mean that the lights will stay on permanently, actively making the short timer effectively useless at preventing light pollution without an integrated system CMS to set smart curfews.

The PIR “on time duration countdown limit” has not been set or will not be managed by the CMS, it must utilise a minimal time duration between 30 seconds and two minutes once motion stops, otherwise this may contravene the dark corridor aspect and any accidental activation less than 30

seconds can generate unpredicted flashes of light that will shatter the unit security of the neighbouring bat commuting lines.

Window blinds and glass frosting. The Home Office is relying upon window treatments to prevent internal light from escaping and blinding local protected bat species. They are suggesting the use of blinds and frosting to satisfy the requirements mandated by the ILP GN 08/23 bat directive. The Home Office has not stipulated whether the blinds will be automated or manual relying upon human management. If the 1256 SU fail to lower the blinds massive amounts of light will flash straight into the dark buffer zones. I **object** to this application on the grounds that the government have not automatically chosen to use smart low transmitted glazing instead of window blinds to remove human error entirely from the wildlife protection light protection loop.

Alternative Flight Paths I understand that alternative flight paths along the disused railway tracks within the site, have been suggested to help with alternative habitats connectivity. Given that the application has used incorrect baseline data, and is unable to show what species, and habitats are present, and how and where these bats interact, and commute into the in the wider landscape, I would suggest this idea is potentially flawed due to data constraints and the lag time required for this habitat to sufficiently establish and the provision for its ongoing protection and maintenance.

Objection 7 Air Quality and Emissions from Diesel Generators, Pumps, Vehicle Fumes and Dust.

Bats are suspectable to dust pollution and can be significantly effected. The way dust pollution effects bats is broadly characterized by how they roost and forage.

Bats are impacted by dust damage to roosting their environments, as dust drifts into building crevices, roof spaces, or tree cavities. Accumulating dust can degrade the roost making it unusable or force the bats to abandon it. If bats inhale large concentrations of fine particle matter whilst resting in a dust heavy environment this will cause respiration irritation and distress.

The coating of a bats habitat with fine particle matter affects the way the bat feeding and hydrates. The EIA Screening document acknowledges dust will coat grass and trees, which will cause causing destruction or damage of bat foraging grounds stunting plant growth and alteration of the local micro-ecosystem. Furthermore, with dust coating on vegetation can kill off or drive away the insects that bats reply on drastically reducing the bats population primary food source leading to starvation. I understand that basic mitigation measures written into the CEMP will try to reduce these effects on the bat population.

Acoustic and physical obstruction due to dust Bats use echolocation to navigate, and dust clouds can interfere with their ability to forage effectively at dusk if the ambient air quality is compromised.

Necessity to Identify the Individual Species Present at A Site Different sub species require different mitigation methods to cope with air pollution and therefore any mitigation must be tailored to the specific ecological traits of each species. As previously mentioned, this has not been achieved and therefore renders the CEMP mitigation techniques suggested invalid. I will illustrate my **Objection** to the harmful effects of dust accumulation being caused by the proposed works.

The Pipistrelle's found on the site roost in tight spaces where high dust accumulation can physically choke their exit holes and trap these rare bats inside. Crevices and gaps dust proof membrane seals are crucial, but this is not mentioned in the CEMP.

Brown Long Eared, found at the site, inhabit buildings with large volume of air, so they are vulnerable to inhaling fine airborne particles. As previously stated in this objection letter during the breeding

season (spring) or hibernation season, (Torpor), Autumn/winter), work should be halted to prevent respiratory failure. If work commences in the Autumn of 2026 this could have profound consequences for the bat population.

The exceedingly rare species the Barbastelle bat if dust generating activities are likely to occur within certain distances from their maternity roosts work is legally banned during the peak summer months to protect the highly vulnerable pups from respiratory distress. As this species was not included in the PEA the need for this mitigation will not be considered in the CEMP plan.

Specialist foragers versus generalist foragers feeding vulnerability.

Brown Long Eared bats glean or pluck insects directly off leaves and tree bark. If dust settles heavily on local woodlands or hedgerows it suffocates the local caterpillars, they feed on and these bats will quickly starve or abandoned the area because they cannot hunt in open air. Protecting the gleaner requires strict vegetation washing.

Open air aerial specialists such as the Noctule, found on the site, these bats fly high and fast above the tree canopy to catch flying insects mid-air. They are less impacted by localised ground dust settling on leaves, but they are still affected by broad regional air pollution that reduces overall insect biomass. The Noctule as an open-air flyer requires the maintenance of unpolluted dark corridors to use as clean feeding zones. In this case mitigation against dust involves managing large scale operations to limit the total height of the dust plume.

Mitigation strategy varies from species to species, yet the applicant has advocated a “one size” fits all mitigation strategy for dust which I **Object** to.

Threats to Bats via Diesel Pollution from generators and increased vehicular traffic, especially HGVs to the site will affect bats severely and is often considered a hidden multilayered threat in ecological planning unlike dust. Diesel exhausts combine a toxic particulate matter, Soot, with harmful chemical gases like Nitrogen Oxides and Polycyclic Aromatic Hydrocarbons, PAHs.

Bats have exceptionally high metabolic rates during flight, and they inhale massive amounts of air relative to their size, making them uniquely vulnerable to the impacts of these diesel admissions.

Physiological harm and blood changes

Respiratory Toxicity fine diesel exhaust particles particulate matter, slip past physical filters directly into deep lung tissue. The PHAs bind to particles and cause cellular inflammation tissue oxidative stress and long-term damage to respiratory function of bats.

Anaemia and Haemoglobin drop bats exposed to PAHs show a direct drop in blood haemoglobin levels. A drop in haemoglobin drastically impairs the blood's ability to transport oxygen. This is a critical handicap for bats which require immense oxygen efficiency to fuel active flight and hunt for food.

Olfactory Blindness and Starvation

Bats are entirely reliant on a stable supply of insect prey which diesel pollution degrades in two distinct ways:

Masking Floral Scents many of the insects that bats hunt find their food by smelling floral scents in the air diesel exhausts fumes chemically alter and destroy flora odour cues. This prevents insects from foraging or reproducing effectively, resulting in a severe local drop in bat food supply.

Direct Insect Toxicity when insects ingest vegetation covered in diesel Soot, they suffer from high mortality and digestive issues. Fewer healthy insects mean bats must expand far more energy to find their meal.

Roost Poisoning from Generators, Pumps and Traffic

Bioaccumulation in sleep spaces heavy diesel machinery and generators emit dense pollution plumes. Bats return to the exact same roosting holes or roof voids daily and heavy localised diesel admissions can become trapped in these tight poorly ventilated spaces leading to respiratory distress. Soot will accumulate inside an impacted roost. Bats groom their fur in the roost so will orally ingest the chemical residue leading to internal chemical poisoning over time.

The proposed development at MOD Bicester A Site will use heavy diesel-powered construction machinery, HGVs for daily transportation of SU and utilities into the site as well as a number of backup generators and water pumps. This presents a tangible environmental risk under UK wildlife law. The applicant in my opinion has failed in their environmental strategy to account for how continuous diesel admissions will affect local protected bat populations roost and foraging lines. I therefore Object to the applicants plans on the grounds they do not mitigate for the risk of the bat population to diesel emissions.

Objection 8 to Increased Noise and Vibrations

The acoustic disturbance of housing 12056 service users, creates an entirely new baseline of human noise footsteps, coupled with increased vehicle movement, generator, and water pump noise, on what is currently a quiet very lightly used military asset located in a rural location.

Bats use echo location to navigate and hunt, and hence constant background noise can mask the low frequency sounds of moving prey reducing their hunting efficiency.

The true amount of noise pollution from the service users is difficult to establish, but a recent visit to the Wethersfield Asylum Centre by members of the Piddington Parish Council acknowledged that the noise level was substantial elevated and overpowering.

I understand that a Noise Impact Assessment was submitted as part of the applicant, but there may have been a failure to model the probable wildlife impact under the National Planning Policy Framework NPPF chapter 15, and the BS4202 O-2013 code of practise.

As the PEA states bats were not present on the site on the day of the walk through. The applicate failed to use the correct baseline data from TVERC, and a full ecological noise assessment has not been authorised, due to EIA Screening. A full Noise Impact Survey should have been conducted to evaluate the acoustic impact on the sensitive bat habitats nearby. Any low-level continuous background rumble from site machinery, generators, water pumps, and traffic, before we add the unpredictable human noise element, will cause acoustic masking, which will degrade the foraging efficiency of the bats.

Acoustic disturbance is a highly damaging nonvisual form of pollution for bats. Bats rely entirely on acoustic signals and echolocation to navigate, communicate and as stated previously, hunt. Any excessive noise from the Service Users or the site operations will function as a severe sensory disruptor.

The noise from the development will affect the local bat population in several distinct ways:

Acoustic masking and foraging failure bats admit high frequency ultrasonic clicks to build a 3D mental image of their surroundings and hear the tiny acoustic vibrations of flying insect prey. Sharp high intensity impulse sounds from noise pollution, admit broad spectrum vibrations. These sounds will mask the ultrasonic frequencies bats rely upon. Field data published by the British ecological society proves that loud localised noise can cause up to a 47% decline in nightly bat activity along foraging lines effectively preventing the light sensitive gleaning bats from catching food. As an example, to illustrate this point there will be a severe impact on light adverse wildlife slow flying Brown Long Eared and Barbastelle bats rely heavily on absolute quiet, to determine a faint acoustic movement of their prey. Even if the normal noise level falls below the nuisance complaints levels, the persistent background hum of the machinery on the site can cause acoustic masking driving these rare bats away from their designated dark buffer zones.

Immediate roost avoidance and flight panic high amplitude unfamiliar noises for example construction machinery could trigger localised bat panic will lead to immediate roost abandonment. If the bats are forced to flee their roost during the day they face a substantial risk of predation. If the noise disturbance occurs during the winter hibernation phase (Torpor) it will force the bats to burn through their fat reserves to wake up, which frequently leads to hypothermia and death.

Traffic Noise it has been identified that increased traffic associated noise can affect foraging efficiency up to twenty metres away from the sound source, meaning that continuous perimeter noise will degrade the use of the site's proposed fifteen metre dark buffer zones located nearby.

Noise from Service Users Operating a site designed for 1256 residents permanently elevates the ambient sound baseline. The Noise Impact Statement treats noise from service users and music as negligible This statement completely ignores the social reality of housing 1256 young people in a dense modular environment, and the effects ambient sound level that will have on the local bat populations.

I do not believe that the proposal has taken into account that fact that’s SU’s sharing outdoor open spaces and modular quarters will inevitably rely on personal audio devices, speakers, and outdoor larger gatherings for leisure, sport and music will increase noise levels I therefore the proposal fails to model or simulate the acoustic footprint of outdoor social spaces.

The applicant has outlined some “Good Noise Practice Measures” outlined in the CEMP. These will be implemented where appropriate, such as use of acoustic barriers. The proposed development will be designed internally and externally to minimise noise impacts on private amenity areas, habitable rooms, and nearby residential receptors. The generators will be located further from on-site noise sensitive receptors and temporary acoustic screening around generators would be installed where required to reduce the noise level within acceptable limits. These are all applicable for the Service Users but do little to avoid the harmful effects the increased ambient sound baseline will have on the acoustically sensitive, protected bat population at A Site.

Vibrations and Bats Vibrations act as a severe non-visual form of environmental pollution that can permanently displace or kill bats. Bats spend their resting hours in physical contact with structural materials hanging from roof Timbers hiding in crevices. If mechanical vibration occurs this vibration is transferred directly into their body.

Awoken During Torpor much of the initial construction and resulting high amplitude ground borne structural vibrations is due to be occur during the bats hibernation phase. I fear the physical shaking

could force the bats on A Site to wake up, use their fat stores, and have no replacement food supply available which could lead to starvation, hypothermia and subsequentially death.

Panic and Roost Abandonment structural vibrations could lead to an immediate panic. If the bats are forced to abandon a roost during the day they face an exceptionally substantial risk of predation.

As previously discussed, the Home Office have conducted a Noise Impact Assessment, but it completely fails to model the structural vibration footprint of the various machinery used on the site and therefore would fall under BS 4202202013 as being non-compliant.

Chronic sensory disturbance during the operational phase will lead to active continuous low-level vibrations generated by the onsite waste treatment plant and the water pump stations, generators and heavy goods vehicle service traffic. These will cause reverberation through nearby hedgerows and trees and leads to acoustic masking and a reduced ability for the bats to hunt.

I **Object** to the applicant's proposal to commence site clearance, and construction works during the hibernation period as the vibrations connected with such activity may cause irrevocable harm to the bat populations present on A Site. Also, poor consideration has been given to the long-term effects of vibrations on the bats ability to hunt.

Objection 9 Wastewater Treatment Plant

A site will need to construct its own wastewater treatment plant for raw sewage treatment. The initial solution to wastewater is to store the raw sewage onsite in holding tank facilities and then tanker the waste away using a fleet of heavy goods vehicles. The applicant admits this is an unviable option for the amount of waste produced.

My **objection** to this part of the proposal is if there is an overflow or mechanical failure from this wastewater plant it could contaminate the adjacent area. This could cause an elevated level of toxicity and pollutants could leaching into the local ditches poisoning the aquatic insects that the bats rely on for their food leading to starvation.

Objection 10 The Physical Destruction of Commuting Habitats.

The application plans to clear peripheral vegetation and demolish older storage buildings this removal can disrupt the physical flight lines bats use to navigate the landscape the bat Conservation Trust warns that breaking these continuous pathways isolates bat colonies from their historical breeding grounds.

Exclusion from existing buildings if structural repairs or internal modifications are conducted on retained assets like building A6, the gaps or entry spaces the bats could potentially use as temporary shelters known as right roosts or traditional roost, will be permanently sealed reducing the total available habitat matrix.

The physical demolition, or heavy roofing repairs during the bats active cycles can directly crush or kill nest roosting bats. To legally proceed the applicants' CEMP must enforce strict pre demolition ecological checks laid out in BS42020-2023. This should include "soft strip" of roofing materials by hand to avoid unnecessary distress and harm to the bats. Seasonal restrictions to ensure works are completely paused during the sensitive summer breeding season and the winter hibernation window should also be included. If the site is granted permission any demolition works should be postponed until 2027. If correct data from TVERC had been used and a thorough ecology survey undertaken the applicant could have accurately established which buildings are being used by the protected bat species and compiled species-specific mitigations and actions for the CEMP.

I **object** to the proposal on the grounds that insignificant data has been gathered and analysed to construct a species-specific mitigation to avoid harming or destroying the bats' habitats at A Site.

Objection 11 Disproportionate Human presence

A Site MOD Bicester is a quiet little used military asset. Transforming this site it into a high-density, 24/7, 365 days a year facility, holding 1256 single young men, plus staff. This will create a persistent human presence, which will affect bats in a multitude of behavioural and environmental pressures including:

- *Daily ambient noise and sensory masking*
- *Basic human activity* voices, footsteps, doors, and music. This creates a continuous background ramble and affects the bats echo location and ability to hunt.
- *Creation of a new microclimate and thermal disturbance*. Human presence on the site will require heating the accommodation, this will change the local thermal profile. If ventilation or heating systems vent warm air outside or create vibrations near roofs cavities, or old storage bays, it can disturb the stable microclimates that bats require during the winter months during hibernation. Any subtle temperature fluctuations or human noise can cause bats to wake up prematurely from their hibernation, forcing them to burn critical fat reserves when food is scarce and this often proves fatal.
- *Bat territory fragmentation*, continuous human movement through these external spaces, pathways and recreational areas creates a psychological barrier for bats. The Barbastelle will avoid areas with regular human traffic. This human movement pattern fragments the landscape, preventing these bats from using the historic transit lines across A Site to access wider Oxfordshire feeding corridors.

From the information I have gathered in the applicant's application, the environmental documentation fails to assess the culminative impact of this disproportionate human footprint correctly under BS42022O-2018 and NPPF (chapter 15)

The applicant should model how a sudden population increase will affect the local biodiversity. As the incorrect data was used, and an incomplete PEA compiled the mitigation plans are structurally blind to how this intense youth presence will displace the rare colonies of bats living on their doorstep.

In Conclusion:

I have noted several objections to the applicant's proposal in this letter mainly the presence of the Barbastelle bat at A Site MOD Bicester.

All of which relate to the ongoing welfare and reproductive ability of the bat populations I have discovered living on A Site. Sadly, an EIA has been ruled out by the Home Secretary but given the applicant's own ecological expert consultants acknowledge the evidence base remains incomplete. I hope I have supplied the Crown Development Committee with enough evidence to argue my case that full seasonal species surveys should be undertaken, enabling a comprehensive assessment of the sites long term environmental footprint. The potential loss of ecology especially the bats if the development goes ahead can be accounted for. The decision on whether the planning application can be granted will then be taken will the full facts surround the ecology of the site and the effects the proposal will have on the species found within A Site.

Yours faithfully

[redacted]