Planning Consultants

[redacted]

16th September 2026

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

BY EMAIL: Crowncasework@communities.gov.uk

Dear Sir / Madam,

Urgent Crown Development Application: PCU/RARE/C3105/3378843 (the "Application")
MOD Bicester (Site A), Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE (the "Site")

1.1 We write on behalf of our client, Value Retail Management (Bicester Village) Limited, acting as managing agent for the owners of Bicester Village ("Value Retail"), in connection with the Application, which seeks permission for the following development (the "Development") at the Site:

> *"the temporary change of use of the former defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation. The Proposed Development comprises the retention and change of use of Building A6, the demolition of existing buildings and structures, the erection of new modular accommodation, and the provision of space for associated health and welfare facilities, site infrastructure, wastewater* [redacted] *plant, roads, access ways, security infrastructure, parking, staff accommodation and facilities, and open space and recreational areas, to accommodate up to 1,256 service users".*

1.2 Over the last 30 years, Bicester Village has grown to become a global brand and one of the UK's most significant retail and tourist destinations, welcoming more than 6.5 million guests each year, with international visitors accounting for one-third of total footfall. With particularly strong brand awareness across Asia, the Gulf and North America, Bicester Village is a major driver of inbound tourism, contributing significantly to Oxfordshire's £2.4 billion visitor economy and providing a compelling reason for many international travellers to visit the United Kingdom.

1.3 More than 3,500 people are employed at Bicester Village, of whom over 2,200 are aged 16 to 24. It is therefore a significant pathway into work and valuable employment experience for young people. Its wider economic activity has created approximately 4,000 net additional jobs across Oxfordshire and 7,150 nationally, predominately in related tourist, hospitality and retail industries which support entry-level jobs, local careers and opportunities for young people.

1.4 Value Retail has invested in the development and phased expansion of Bicester Village over many years, in parallel with major highways and other infrastructure works required to support the needs of the new development and enhance the local transport network, including improved pedestrian links, cycle provision, shuttle buses, and a new railway station.

1.5 Accordingly, Value Retail together with our local stakeholders have a direct interest in being given a fair and reasonable period to assess and make meaningful representations for this Application of national importance on land at MOD Bicester.

1.6 In short, Value Retail remains very concerned at the limited timescale afforded to review the application material, the heavily redacted nature of the documentation which has been produced and the number of key issues which have not been adequately considered. Even in the limited time available, Value Retail's consultant team has identified significant planning, environmental and sustainability concerns and unresolved issues, which undermine the ability to reach a sound and balanced planning judgement on this Application at the current time. These concerns also go to fairness and transparency for local stakeholders and communities, and fundamental issues of consistency in planning decision making.

1.7 On behalf of Value Retail, we respectfully request that the Secretary of State does not determine the Application until such time as:

a. it addresses the significant conflicts with the NPPF and development plan, and multiple omissions, contradictions and inconsistencies, and unnecessarily redacted information in the submitted material that lead to such material planning, environmental and sustainability concerns;
b. once addressed, it then gives all local stakeholders and communities a fair and reasonable opportunity to review and make further representations on the Application; and
c. it has fully considered all of the responses then received.

Previous Proposals for the Site

2.1 In order to properly understand the context for the current Application, it is relevant to consider the significant planning, sustainability and environmental issues raised by previous proposals for a materially smaller asylum centre on this Site.

2.2 Applications, by way of a Notice of Proposed Development, were made by the Home Office in May 2002 for the demolition of existing buildings and erection of a Home Office Immigration Accommodation Centre on the same 10.2-hectare site as the Development. This related to the provision of accommodation for 750 asylum seekers (including families and individuals) (hereafter referred to as "Service Users" or "SUs"), together with community, catering, administrative, welfare, and hearing facilities, a sports building, 150 car parking spaces, and landscaped areas. As the relevant local planning authority, Cherwell District Council ("CDC") were required to assess the applications (CDC refs: 02/01044/GD and 02/01045/GD). These applications were refused by CDC at Committee in July 2002, citing concerns with the lack of an alternatives site assessment; harm caused to the character of the countryside; the site's unsustainable location; the proposals' impact on local services; and archaeological and ecological concerns.

2.3 Following an appeal of the refusal, a Public Inquiry was held across 14 days between December 2002 and March 2003 (PINS ref: APP/C3105/V/02/1097456). Following the conclusion of this Inquiry the proposals were recommended for refusal by the appointed Inspector, who concluded that, inter alia, the proposals would conflict with the development plan, the proposed development would be 'inherently unsustainable due to its rural location and its

relative inaccessibility in terms of transport' and would pose a risk of road accidents for SUs, and, as a consequence of the lack of total self-containment, there would be some burden for local service providers. On balance, the Inspector recommended that the application be refused, noting that:

> "*the need to create a more sustainable pattern of development lies at the very heart of the Government's well established approach to land use planning in this Country. It would, in my view, be inappropriate for the Government to make an exception in respect of its own development" (IR paragraph 14.75)*

2.4 Against the recommendation of the Inspector (and following CDC's clear objection and subsequent refusal), on 18th August 2003, the Office of the Deputy Prime Minister (ODPM) granted outline planning permission for the proposals.

2.5 The Inspector identified a number of harms arising from the proposals, including that the Site was in an unsustainable location, and that the surrounding roads had inadequate footpath provision. This harm is likely to be even greater with this proposal given its greater scale. However, while noting these conclusions, including the risk to pedestrians in the area of the accommodation centre, and acknowledging that the application did not accord with the development plan, the Secretary of State attached significant weight to the then Government's policy to trial accommodation for asylum seekers in non-urban locations, and decided to grant permission, noting, inter alia, that the centre would generally speaking provide all services needed by SUs on site so reducing their need to travel than would otherwise be the case and thus not resulting in a "very serious" risk (paragraph 37).

2.6 On 21st December 2004, planning permission was granted by CDC for enabling works associated with the approved outline consent (LPA Ref: 03/01824/GD), including demolition of the existing gatehouse, erection of a new gatehouse, extension of the perimeter fence, and construction of two lay-bys.

2.7 Reserved matters details (LPA Ref: 04/02503/GD) relating to the outline scheme approved by the ODPM were subsequently submitted for public consultation. CDC raised objections to those details in respect of, inter alia, siting, the standard of design of the accommodation blocks and the proposed lighting which would result in significant intrusion into the night-time environment, to the detriment of the character of the surrounding area.

2.8 The reserved matters application was never determined. The Home Office subsequently withdrew the application and abandoned the project (including on the grounds of likely cost)and the site was sold back to the Ministry of Defence. The National Audit Report dated 8 November 2007 entitled Home Office: The Cancellation of Bicester Accommodation Centre reported:

> *"Home Office figures indicate that by the end of March 2007, it had spent some £33.7 million on the accommodation project, of which some £28 million related to Bicester. Of the £33.7 million, the Home Office noted £29.1 million in its financial statements as a loss".*

2.9 Value Retail is concerned that the significant concerns identified by the Local Planning Authority and the Inspector, including but not limited to the inherent unsustainability of the location, environmental issues and risk to pedestrian safety remain and are likely to be magnified in the case of the current application which is substantially larger in scale than the previous scheme.

2.10 Further, the fact that the previous scheme did not proceed due to concerns regarding cost and deliverability means that these are highly material considerations when determining this application. Notwithstanding this, no information regarding cost and deliverability has been provided with the application.

2.11 Furthermore, the current Application falls to be determined against the current policy context, most recently set out in the National Planning Policy Framework (NPPF) published in August 2026. There is no specific national planning policy on asylum seeker accommodation, nor any policy that lends support to locating such accommodation in inaccessible rural areas. The Application therefore falls to be assessed against the general policies of the NPPF, which (in the latest version) places far greater policy emphasis on environmental impacts, flood risk, social inclusion and public safety, tackling climate change, sustainability and reducing the need to travel.

Inadequate Consultation period

3.1 In contrast to the process adopted previously, the Government's decision to adopt the Urgent Crown Development (UCD) process allows very limited time or opportunity for consultation or scrutiny of the material which supports the current Application, despite the proposals being materially larger and there being more onerous planning policy requirements now than then.

3.2 Value Retail note that the Application was submitted on 6th July 2026 and subsequently validated and published on the Government's website on 2nd September 2026. On 4th September 2026, the Government confirmed that the public may submit representations on the Application, with a representation period running from 7th to 17th September 2026 (a period of only 10 days).

3.3 For the reasons set out in the CMS letter dated 7th September 2026, Value Retail maintains its position that the 10-day representation period stipulated is wholly inadequate, and is prejudicial to allowing Value Retail and the other significant stakeholders potentially affected by this Application to review the voluminous material submitted. Once the issues identified in this letter and any representations provided by other stakeholders are addressed, Value Retail requests that the Secretary of State reconsults all stakeholders and such stakeholders are given at least 21 days to provide any representations.

3.4 However, in the limited time available, Value Retail has instructed its professional team, covering matters including planning, highways, drainage, flood risk, ecology and ground conditions to undertake a review of the material which has been made public, (noting that there is clearly further material which is missing and/or has been withheld, and what has been made public is in some cases heavily redacted).

3.5 For the reasons which we set out below, even on this initial review of the application material, Value Retail has identified significant planning, environmental and sustainability issues, including fundamental conflicts with the NPPF and development plan. There are also multiple omissions, contradictions and inconsistencies, and unnecessarily redacted information in the submitted material, such that it makes it impossible to determine the full extent of the impacts and Value Retail considers it would not be possible for the Secretary of State to make a sound determination of the Application based on this material.

EIA Screening Direction

4.1 The Secretary of State for Housing, Communities and Local Government issued an EIA Screening Direction (dated 26th August 2026, case reference PCU/EIASCR/C3105/3378828) which concludes that the proposed development is not EIA development within the meaning of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Value Retail has commissioned its EIA consultants to review the Screening Direction, which has identified significant concerns as to the basis for this conclusion.

4.2 The Screening Direction relies on mitigation measures that are unspecified, unsecured, and in some cases require further investigation that has not been carried out. In this letter we focus on planning matters, although we note that in addition to concerns regarding the adequacy of the environmental information and basis of the Screening Direction, an added consequence of the negative screening is that the mandatory 30-day publicity/consultation period for EIA development does not apply, thereby severely curtailing public consultation as noted above.

Assessment Against the Policy Requirements of the NPPF

5.1 The NPPF, published in August 2026, sets out the Government's planning policies for England. Whilst the UCD procedure does not require decision-makers to determine applications in accordance with a development plan, as this is ultimately a planning decision Value Retail considers the NPPF remains a very important material consideration, which should attract significant weight in this case. The conflicts with the NPPF, as outlined below, also highlight the significant wide-ranging impacts of the proposals.

5.2 Value Retail recognise that the submission documents were prepared before the NPPF was published but would expect, as a minimum, that the Application material is updated to assess the Application against current Government policy requirements. Our initial review of the Application proposals against the NPPF identifies a number of key 'in principle' concerns including, but not limited to, the following.

Principle of Development

5.3 Policy S5 states that only certain forms of development should be approved outside settlements. This includes the reuse of previously developed land, and development which would address an evidenced unmet need where the development would be physically well related to an existing settlement. Notwithstanding that the Site is not physically well related in scale or location, while the application material identifies a generic need for accommodation for asylum seekers nationally, no evidence is adduced as to the quantum of need nationally, the capacity of other sites being proposed and therefore the level of unmet need. Nor is any specific need identified for the proposal on this Site or in the wider area.

5.4 The NPPF states that proposals falling outside the defined categories should only be approved in exceptional circumstances where the benefits would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement. This is further reflected in the policies which seek to mitigate climate change by reducing the need to travel.

Transportation

5.5 Policies TR3 and TR4 require significant adverse impacts on the transport network to be mitigated to an acceptable degree, and requires development to give priority to walking, wheeling, and cycling. The submitted Transport Assessment assumes that staff travelling to and from the Site will rely almost entirely on private motor vehicles and that SUs will rely on shuttle buses and taxis, reflecting the lack of accessibility by any alternative means of transport. No works are planned to improve pedestrian access or address the safety concerns previously identified. This pattern of dependency on private motor vehicles and shuttle buses is fundamentally contrary to Policies TR3 and TR4 (and indeed the whole tenet of Government land use policy).

Community Facilities

5.6 Policy HC3 states that proposals for housing, employment or other development which would give rise to significant numbers of people living in, working, or visiting an area should be informed by an understanding of the need for associated improvements to community facilities and public service infrastructure and provide for new or improved community facilities which are necessary to make the development acceptable. The Application proposals do not include any robust assessment of the adequacy of existing community facilities or public service infrastructure or how all the requirements of the SUs will be met, whether on or off Site.

Ground Conditions

5.7 Policy P2 states that sites should be suitable for their proposed use, taking into account ground conditions (whether due to natural hazards or current and former activities such as mining or fuel storage), and the extent to which any such risks can be mitigated, and the potential impacts on the natural environment arising from remediation. From our review of the submitted information, there has been no intrusive site investigation for contamination or ground conditions and no detailed investigation for and residual effects of ordinance and/or fuel storage associated with the previous Ministry of Defence use.

Safety and Security

5.8 Policy P5 states that development proposals should anticipate and address possible malicious threats and other hazards (whether natural or man-made) to their occupiers and users. Despite the obvious and high profile evidence of demonstrations and threats to the safety of SUs, and public fear of the risk of crime and public safety associated with the proposed use, Value Retail is concerned there is no detailed assessment of security measures for the safety of SUs or the wider community or the operational impacts on local policing and emergency services.

Flood Risk

5.9 NPPF Chapter 14 requires development to avoid increased vulnerability to climate change impacts including flood risk and to direct vulnerable development away from areas of highest flood risk. Policy F5 states that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Where the test applies, development proposals should not be located in areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding.

5.10 Approximately 25% of the Site is at high risk of surface water flooding (greater than 3.3% Annual Exceedance Probability). Parts of the northeastern corner fall within Flood Zones 2 and 3, associated with the River Ray and an unnamed tributary. The Site is not subject to an allocation in a development plan which was subject to the sequential test during preparation, and in these circumstances a site specific flood risk assessment is required to demonstrate clearly that no built development within the site boundary would be located on an area that would be at risk of flooding from any source.

5.11 Value Retail is concerned that the material submitted to date fails to meet this policy requirement, and no sequential site assessment has been provided. The Site's existing drainage infrastructure is in a poor state of repair, with two pumps confirmed as out of operation. The Drainage Design Statement is at preliminary RIBA Stage 2 only, with key parameters including discharge criteria and outfall arrangements unconfirmed. As noted later, the drainage strategy is insufficiently advanced to be approved via condition and cannot be considered to satisfy NPPF policy requirements.

5.12 Even where the sequential test is satisfied, the exception test must also be met, requiring the applicant to demonstrate that the development provides wider sustainability benefits outweighing the flood risk, and that it will be safe for its lifetime without increasing flood risk elsewhere. No material sufficient to enable the exception test to be applied, or met, has been provided.

Landscape and SSSI

5.13 Policy N6 states that development proposals affecting a Site of Special Scientific Interest (SSSI) should only be supported if there would be no adverse effect on the sites features of special scientific interest, or the benefits of the development in the location proposed would clearly outweigh the impact, or the impact on the protected feature is being addressed through an Environmental Delivery Plan.

5.14 The site falls within the Arncott Bridge SSSI Impact Risk Zone. Natural England's initial response of 23 July 2026 stated explicitly that 'the proposal could have potential significant effects on Arncott Bridge SSSI' and identified that hydrological connectivity between the site and the SSSI cannot be ruled out. Natural England's subsequent clarifications of 11th and 13th August 2026 (which have not been disclosed) were conditional on a finalised drainage strategy – a strategy which, as noted above, does not yet exist.

5.15 Value Retail requests that the Natural England clarifications, referred to in the EIA Screening Direction but not disclosed as part of the Application documents, be published in full so that consultees can assess the basis on which Natural England's position is said to have changed.

5.16 In these and other respects, on the limited information provided the Application proposals raise fundamental 'in principle' planning issues having regard to the policies of the recently published NPPF, in the absence of any demonstrable exceptional circumstances to justify the proposals in this location.

Conflicts with the Cherwell Adopted Local Plan 2011–2031 (Part 1)

6.1 Whilst strictly speaking the duty in section 38(6) of the Planning and Compulsory Purchase Act 2004 does not apply under the UCD procedure, Value Retail considers the adopted Local Plan

policies remain a highly important material consideration. Given the Government's support for the role and importance of local plans, Value Retail would expect any departure from the development plan to be justified by clear evidence, adopting a consistent approach to that which was taken by the Secretary of State at the aforementioned previous Inquiry.

6.2 The Inspector and Secretary of State both concluded that the previous smaller proposals were contrary to the development plan. Based on our initial review of the planning issues in this case in the limited time afforded by the consultation period, we consider the current application would be clearly contrary to a number of Local plan policies. These include, but are not limited to; Policy ESD13: Local Landscape Protection and Enhancement; Policy ESD14: Biodiversity and the Natural Environment; Policy ESD15: The Character of the Built and Historic Environment; Policy ESD1: Mitigating and Adapting to Climate Change; and Policy SLE4: Sustainable Transport.

6.3 The emerging Cherwell Draft Local Plan is a further material consideration and its policies on sustainable development, biodiversity net gain, and climate change adaptation reinforce the concerns identified above.

Inadequate and Incomplete information

7.1 Given the range of identified conflicts with national and local plan policies, and fundamental 'in principle' planning issues raised by the proposals, Value Retail would expect the Application to provide a comprehensive, up to date assessment of all the relevant issues in order to reach a soundly based decision, including clear evidence of any exceptional circumstances which are said to justify the proposals despite the clear and fundamental planning obstacles in this case.

7.2 As summarised above, the initial assessment of the Application material undertaken by the Value Retail consultant team against the policy requirements of the NPPF has identified a large number of documents that are missing and/or assessments which are necessary to the proper determination of the Application have not been undertaken at all. As noted above, a number of assessments which would be necessary to provide a sound assessment of the likely impact of the development are incomplete or absent. These include:-

- Construction traffic assessment
- Phase 2 ecological surveys for any protected species despite PEA recommendations
- Finalised drainage strategy
- Confirmation of foul water capacity from Thames Water
- Assessment of impacts on the Nitrate Vulnerable Zone or Drinking Water Safeguard Zone
- Assessment of potable water demand
- Intrusive site investigation for contamination or ground conditions, including UXO
- Assessment of noise generated by the development on surrounding receptors
- Detailed site investigation
- Assessment of operational impacts on local policing and emergency services
- Biodiversity Net Gain assessment (needed to satisfy the NPPF and Local Plan policy requirement to demonstrate measurable biodiversity net gain).

7.3 Having reviewed all the information which has been made available, Value Retail's consultant team has identified significant omissions, contradictions, and extensive redactions which

reinforce the concern that the material does not provide a sound basis upon which to determine an application of this scale and significance.

7.4 We include a table at **Appendix 1** which identifies some of the many inconsistencies, contradictions and inadequacies in the submitted material, which we consider make it impossible to understand the nature and potential impacts of what is being proposed. These include, but are not limited to the following.

i) The nature and scale of development proposed

7.5 The accompanying documents demonstrate significant inconsistencies in the size and nature of the proposed development. For example, the Landscape and Visual Statement assesses a development of not more than 6m high whereas the Parameters Plan shows a maximum height of 12m. There is no visual assessment of a development of 12m as indicated by the Parameters Plan. Further examples are included in the table at Appendix 1.

7.6 Significant reliance is placed on the provision of on Site facilities to reduce the need for SUs to travel, without adequate details of the scale and quality of provision and whether this will meet identified needs. The EIA Screening Direction states that:-

'Mini bus SU arrivals are estimated at 2 vehicles per day. Taxi SU departure will be starting after the first period of SU occupancy has expired from the site opening (occupancy likely set at 90 days) which will be up to 30 trips per day. Number of shuttlebus transports for SU's to use off site facilities have not been estimated, but will include longer and shorter trips for SU's depending on which facilities are to be accessed'.

7.7 This appears to contradict the assertion that the facility will be largely self-contained, and demonstrates that the degree of reliance on local community facilities has not been adequately considered or quantified.

7.8 The EIA Screening Direction acknowledges :-

'There are potential effects on the existing population, SU's and staff with regard to their physical and mental health, and access to healthcare. The Ward area is more deprived than 71% of neighbourhoods in England, the presence of the facility may give rise to anxiety amongst local residents such as through fear of crime. Both the SU's and the local populace may be adversely affected by protesters/demonstrators, or in a worse case disorder within the site. This may be exacerbated through the site being non detained and that the SU's can, albeit with difficulty, have access to local populated areas'.

7.9 Value Retail is concerned that these risks have not been properly assessed, if at all, based on the unsubstantiated assertion that the facility will be in effect self-contained.

7.10 As a consequence of these and other inconsistencies in respect of the scale and nature of the development, Value Retail considers it is not possible to undertake a sound assessment of its

visual impact, traffic impacts, pedestrian safety, and the adequacy of existing community facilities to cope with any additional demands generated by the development.

ii) Redactions

7.11 The ability to review the application documents is further undermined by the very extensive redactions in those documents which have been made available. For example, the Transport Assessment is subject to extensive redactions relating to trip generation, staff and service activity, access arrangements, parking provision, phasing and emergency access (see summary table at **Appendix 2**). The justification for the extent of redactions in this and other submitted documents is unclear, but as submitted the Application does not provide a transparent or complete evidence base which would allow the effects of the proposed development to be adequately assessed.

7.12 The position is compounded by the fact that certain documents have not been disclosed at all (such as the Security Management Plan) and the Government has not provided a list of documents that form part of the Application but have been withheld.

7.13 Notwithstanding these difficulties, and the very limited time available to consultees to comment on the Application, Value Retail has sought the views of its consultant team on the submitted material, which are summarised below.

iii) Transport and access

7.14 As identified above, the submitted Transport Assessment and Travel Plan are subject to extensive redactions, including in relation to matters that are fundamental to any meaningful transport review. It is difficult to see how matters such as trip generation, staff numbers and access arrangements could properly be regarded as security-sensitive, particularly given the well-documented pedestrian safety concerns identified at the previous Inquiry.

7.15 In the absence of this information, the submitted evidence does not provide a sufficiently transparent or complete basis on which to assess the transport effects of the proposed development.

7.16 Even in its heavily redacted form, the Transport Assessment confirms that the Site is remote, with minimal provision for pedestrians and no provision for cyclists, and is based on the assumption that staff would arrive by private car and access to nearby services would rely on mini bus or taxi trips (as noted above). The Transport Assessment relies on comparisons with less heavily redacted data for RAF Weathersfield, without proper analysis of the comparability of the sites and proposals for each, and does not currently demonstrate that the development would operate safely and acceptably, avoid unacceptable traffic impacts or comply with relevant policy expectations relating to sustainable locations and mode choice.

iv) Flood risk and drainage

7.17 As noted previously, the flood risk assessment, drainage and utilities information provided provides no justification for not undertaking a sequential test, as required by the NPPF. The Site is at high risk of surface water flooding and the potential for the development to increase flood risk on and offsite has not been adequately assessed. An onsite packaged treatment plant is proposed as a 'fallback', which would require an Environmental Permit from the EA, but no

timeline or agreement in principle has been sought, and no suitable outfall from the site for the wastewater treatment works has been identified. There is also no assessment of how the discharge of treated effluent from an onsite package could potentially impact on the Arncott Bridge SSSI, located downstream of the Site.

v) Ecology and Habitats

7.18 The review of the Preliminary Ecological Appraisal (May 2026), Habitats Regulations Assessment (HRA) Screening and Natural England's advice has identified significant ecological and legal issues regarding missing survey data sets and the proposed clearance of vegetation and buildings. The surveys used are incomplete and there are no detailed species impact assessments and corresponding mitigation strategies to allow the informed determination of the application.

7.19 The Site lies 1.82 km from Arncott Bridge Meadows SSSI and sits directly within its SSSI Impact Risk Zone (IRZ). Furthermore, the Site falls within the Cherwell (Ray to Thames) Nitrate Vulnerable Zone (NVZ) and contains drainage ditches connected to the River Ray catchment. Natural England's initial response of 23rd July 2026 confirms that 'the proposal could have potential significant effects on Arncott Bridge SSSI' and advised that hydrological connectivity between the Site and the SSSI cannot be ruled out.

7.20 Natural England's subsequent clarifications of 11th and 13th August 2026 (which have not been disclosed) were expressly conditional on the finalisation of a drainage strategy that demonstrates the development will not alter the existing hydrological regime. That drainage strategy does not exist, and accordingly Value Retail is concerned that the HRA Screening cannot be accepted as a basis for a no-likely-significant-effect determination.

vi) Other Environmental Considerations

7.21 Considering the wider suite of documents, including the EIA-related documents, a number of initial issues have been identified. These are set out in Appendix 1 in so far as they relate to inconsistencies and inadequacies within and between documents. Some headline points are set out below.

7.22 The Air Quality Report submitted with the Application acknowledges that the proposed development relies on on-site generators, yet there is no reference to or consideration of these in the report and, specifically, if there are unacceptable air quality effects. There is also no assessment of potential impacts from traffic emissions.

7.23 In terms of the submitted Noise Impact Assessment, there is a failure to appropriately consider, let alone assess, the effects of the surrounding uses on the proposed development. Assessment is limited to the potential impact of existing (not proposed) road traffic noise on the proposed uses only. Furthermore, the NPPF has been updated since the issue of the Noise Impact Assessment and whilst the changes to national planning policy do not fundamentally change, (new) policy P4 identifies that in relation to the 'agent of change' principle it is the consented land use, rather than the current use alone, that needs to be considered for noise producing /

noise sensitive developments. This has not been adequately considered in the submitted material.

vii) Cherwell District Council's Comments

7.24 CDC has called a Special Planning Committee to review the proposals and their engagement with the application. Within the Report to Committee Members, officers identify a significant number of deficiencies, contradictions and missing information. A number of these overlap with the concerns raised in this letter. The input from a number of CDC departments supports the very clear recommendations to Members at paragraph 2 of the Report, *"to formally object to determination and to any grant of planning permission on the present limited evidence, because the proposal is not sufficiently defined or assessed with sufficient depth and several matters fundamental to the acceptability of the proposals remain* unresolved". The Special Planning Committee meeting is being held on 16th September 2026 (the same day as this letter being issued).

Undue Reliance on Planning Conditions

8.1 It is an established principle in planning law that planning conditions cannot be used to defer the consideration of matters which go to the principle of whether planning permission should be granted.

8.2 That is particularly the case since once planning permission has been granted, the Council's role when discharging conditions is constrained by the permission that has already been issued. The Council cannot use the discharge of conditions process to revisit the principle of whether planning permission should have been granted in the first place. If, as is proposed here, fundamental issues are left to condition, the Council may later be placed in the position of having to approve the best scheme at condition discharge stage that can be achieved within the confines of the permission that has already been granted - even if what is proposed is unacceptable.

8.3 That is why national planning policy and guidance is clear that in order for a condition to be "reasonable", there must be a realistic prospect that it can be discharged. For example, the Planning Practice Guidance on Contaminated Land states, in the context of outline planning applications, that the decision-maker must have "sufficient information to be confident that it will be able to grant permission in full at a later stage bearing in mind the need for the necessary remediation to be viable and practicable". Given that this is a full application, the level of confidence required is at least as high, if not higher.

8.4 Based on its consultant's review of the submitted material, Value Retail is concerned that important areas of survey and design work which are necessary to fully assess the impact of the development and therefore fundamental to the acceptability of the Application are proposed to be addressed by way of condition, without any certainty that such matters can be satisfactorily resolved, or any additional consequences of doing so.

8.5 For example, the Drainage Design Statement is at preliminary RIBA Stage 2 only, with key parameters including discharge criteria and outfall arrangements unconfirmed. As a consequence, the drainage strategy is insufficiently advanced to be able to provide any certainty that an effective solution can be secured, or what would be the environmental and other impacts of doing so. In these circumstances, the preparation of a drainage strategy cannot be

left to conditions, particularly as the clearly expressed concerns of Natural England also rely on the outcome of this exercise.

8.6 There are similar issues in relation to foul drainage (where the design of a permanent strategy is left entirely to condition); contamination risks (where reliance is placed on future surveys and remediation with no consideration at this stage of the likelihood or nature of the remediation that would be required) and in relation to ecology (where the Preliminary Ecological Appraisal submitted with the Application notes that it does not purport to provide a "comprehensive assessment of the ecological interest of the site" but merely an assessment of the ecological interests "present on the day the site was visited").

8.7 More generally, whilst the Application is a full application, the only plans submitted for approval which have any bearing on the development proposed are the parameters plan (which itself is inconsistent with the supporting application documents) and a demolition plan. The level of detail provided is less than would normally be provided with an outline application. In effect, what is being sought is "permission in principle", with the technical detail being resolved at a later stage. This approach is inappropriate, given that there is a bespoke route for this type of application in the Town and Country Planning Act 1990 in section 58A - and the proposed development falls outside the scope of this section (and this route has not been used in any event).

Inadequate Consideration of Alternatives

9.1 Value Retail acknowledge the statutory background concerning the Home Office's obligations under the Immigration and Asylum Act 1999 and the genuine national pressures on the asylum accommodation estate. However, the Statement of National Importance does not demonstrate that the Bicester site is the most appropriate location for a facility of this scale, or that the demonstrable planning harms identified in this representation are outweighed by the claimed national benefits.

9.2 Value Retail note that at the time of the previous Public Inquiry both the Inspector and Secretary of State concluded that it was not necessary to consider alternative sites, including other sites proposed for asylum centres. This was, at least in part, based on the Secretary of State assertion that all the planned sites at that time were required to meet the need. In this case, no evidence is put forward to quantify the unmet need for asylum accommodation and the contribution which this and other planned sites would make to meeting it.

9.3 The proposed facility is a nationally significant development with no specific locational requirement. The submitted material acknowledges the likelihood of a range of adverse impacts arising from this proposal in this location, which is accepted to be inaccessible by alternative means of transport and therefore fundamentally in conflict with the NPPF and local plan. In order to undertake the planning balance in this case, Value Retail considers it is necessary to understand the contribution of this Site to any identified need, and the extent to which the same need could be met on other sites in more sustainable locations. In contrast to the position at the previous Inquiry, it is very clearly the case that alternatives need to be considered, owing to (a) the requirement for there to be a national need based justification, specifically incorporating locational requirement(s) and (b) that the sequential flooding approach requires consideration of alternatives in any event.

9.4 The requirement to consider alternative sites is further reinforced by the Government's commitment to tackle climate change. The environmental consequences of building a temporary facility, in an inaccessible location with limited current access and connectivity to essential infrastructure and services appears to be directly at odds with the NPPF policies, compared to possible alternative more accessible sites with existing accommodation, services and utilities connections. The costs of building and operating this development are likely to be significant.

9.5 Given the failure to implement previous smaller proposals for the site, including for reasons identified in the National Audit Office's 2007 Report, Value Retail considers this further calls into question the suitability and deliverability of this site for the proposed use, in addition to the very significant planning issues which the application raises.

Conclusion

10.1 Value Retail remains very concerned at the limited timescale afforded to review the application material, the heavily redacted nature of the material which has been produced and the number of key issues which have not been adequately considered or assessed, if at all. Even in the limited time available, Value Retail's consultant team has identified significant planning, environmental and sustainability concerns and unresolved issues, which undermine the ability to reach a sound and balanced planning judgement on this Application at the current time. These concerns also go to fairness and transparency for local stakeholders and communities, and fundamental issues of consistency in planning decision making.

10.2 On behalf of Value Retail, we respectfully request that the Secretary of State does not determine the Application until such time as:

a. it addresses the significant conflicts with the NPPF and development plan, and multiple omissions, contradictions and inconsistencies, and unnecessarily redacted information in the submitted material that lead to such material planning, environmental and sustainability concerns;
b. once addressed, it then gives all local stakeholders and communities a fair and reasonable opportunity to review and make further representations on the Application; and
c. it has fully considered all of the responses then received.

10.3 If such steps are not taken, we do not consider that it is possible for the Secretary of State to make a sound determination of the Application based on the current material.

10.4 Should you require any further information, please do not hesitate to contact [redacted] of this office.

Yours faithfully

[redacted]

APPENDIX 1 – EXAMPLES OF INCONSISTENCIES AND INADEQUACIES

Topic (document(s))	***Inconsistencies / Inadequacies: Excerpts and Commentary***
Swept analysis (Transport Assessment)	Para 4.5.3-4.5.4 refer to swept analysis of the southern access for servicing vehicles and coaches. Appended swept paths appear to show these vehicles using the northern access.
Traffic Survey (Transport Assessment)	Para 3.9.1 states an automatic traffic counter survey was conducted adjacent to the existing site access. Subsequent text in the TA provides separate results for the northern and southern accesses, it is unclear if a single or multiple surveys were conducted.
Walking Distances (Transport Assessment)	Para 3.4.4 states the outskirts of Bicester are within walking distance. Figure 3-1 shows the pedestrian catchment does not extend beyond Lower Arncott and Blackthorne and is remote from the built up area of Bicester.
Site Area / Assessment Area (FRA / other docs)	FRA, paragraph 3.1.3, page 14 : "the site area is 50.1 ha." Other documents: the site area is 10.22 ha. The site area considered in the FRA is the wider MOD site which results in a high-level and insufficiently detailed assessment.
Fluvial flood risk (FRA)	FRA, paragraph 6.1.2, page 30: "The site is located almost entirely within Flood Zone 1, with a minor area of Flood Zones 3 and 2 in the far north and east of the site." FRA, paragraph 6.1.2, page 30: "The site is entirely at very low risk from rivers and the sea."
Surface water flood risk (Planning Proposal Statement / FRA)	The Planning Proposal Statement states that surface water flood risk can be addressed through a drainage strategy. However, the recommendation in the FRA is that development should be placed outside areas of surface water flood risk. Planning Proposal Statement paragraph 7.32, Page 71: "The [flood risk] assessment confirms that, whilst parts of the Site are affected by surface water flood risk and a limited area of fluvial flood risk, the proposal can be designed and managed so that development is safe for its lifetime and does not increase flood risk elsewhere. <u>These matters can be addressed through a detailed drainage strategy and sustainable drainage measures</u> secured through the planning process." FRA , paragraph 6.1.3 and paragraph 6.2.1, page 30 "The risk of flooding from surface water is therefore considered as moderate in the present day and future climate change scenario … The following is recommended: • Where possible, any new development should be located outside of any flood extents to avoid triggering the need for a Sequential Test. • Consideration should be given to the location of any future development and changes to levels. Any future development or changes to levels should be located outside areas of surface water flood risk. • A hydraulic model of the overland flow path may be appropriate to further analyse the flood risk to the site from surface water flooding. It is recommended that no development is located within the surface water extents that could impede this flow path."
Existing surface water drainage and flood risk (FRA / Drainage Design Statement / Utilities Infrastructure Assessment)	It is not agreed that the initial premise that national flood risk mapping can be dismissed is correct, because it does not account for existing drainage networks. Nevertheless, if this were a valid point, the submitted documents identify substantial deficiencies in the existing drainage network, so the conclusion of the FRA that the existing drainage would 'likely reduce' flood risk is unsubstantiated. Paragraph 4.9.5, page 28: "Any future development could result in new structures within surface water flood extents as indicated by the EA Risk of Flooding from Surface Water modelling. As set out above, this risk extent mapping does not make detailed consideration of existing surface

	water drainage networks such as ditches and surface water pipes. This would likely reduce the extent of surface water as indicated to the drainage ditches, and hence minimise any displacement caused by proposed development." Drainage Design Statement, section 4.1, pages 11–12: "It is apparent that formal drainage systems have not been subject to routine maintenance for a considerable period and are therefore considered to be non-operational." "The MOD site team confirmed that Zone 1 is prone to frequent surface water flooding." "The primary cause of flooding was attributed to the failure of two pumps formerly responsible for flow management, which are currently out of operation." "Both ACO drains and gullies appeared to be blocked, which would likely result in flooding regardless of pump status." Utilities and Infrastructure Assessment, section 3.5, page 7: "Formal systems appear poorly maintained and largely non-operational… Evidence of ponding and localised flooding was observed despite dry conditions, indicating ineffective performance of current assets."
Foul drainage (Planning Proposal Statement / Drainage Design Statement	Planning Proposal Statement, paragraph 7.77 and 7.79, page 80 and 81: "The Utilities and Infrastructure Assessment concludes that whilst existing capacities within the utility networks requires further survey, the provision of short-term infrastructure [including power generation and foul water] will be immediately available to meet the full requirements of the proposed development." "measures to manage foul water in the short-term is available and is ready to meet the immediate needs of the proposed development." Drainage Design Statement, sections 9.2, 9.4 and 11.3, pages 28, 30 and 39: "Initially the foul arisings can be tankered off-site, assuming that a receiving WwTW is found with sufficient capacity.." "The initial phase of the development may be served by a cesspool, with the waste being tankered away. Although this will require a municipal works to take the waste, space has been provisioned for the cesspool on the masterplan." "Recommendation: Undertake a detailed level and hydraulic assessment to confirm whether foul flows can be conveyed by gravity to the proposed cesspool/inlet pumping station, including verification of site levels, invert levels, pipe gradients, and any constraints that may necessitate a pumped solution."
SSSI Impacts (Planning Proposal Statement)	Planning Proposal Statement, paragraph 7.34, page 72: "The ecological evidence identifies that further targeted survey work and appropriate mitigation will be required as the design progresses. However, the submitted Preliminary Ecological Appraisal and Habitats Regulation Assessment provide a clear basis for concluding that the proposal can be brought forward in a manner that avoids unacceptable ecological effects, subject to the implementation of mitigation, management and, where necessary, licensing requirements. The proposal is therefore capable of complying with relevant biodiversity policy requirements." Natural England consultation response dated 23 July 2026, page 1: "I note that hydrological connection between the site and the SSSI cannot be ruled out and have advised that the project will need to demonstrate that it will not alter the existing hydrological regime and therefore risk impacting the interest features of the downstream SSSI."
Development Height / Assessment Envelope (Landscape and Visual Statement / Planning Proposal Section)	Landscape and Visual Statement, paras 1.2.2 and 6.1.1, pp.5 and 25; Figure LA.02, p.32: The proposed modular buildings would be no greater than 6m high and the ZTV is generated on the basis of a 6m development height. Planning Proposal Statement, paras 1.8–1.9, pp.7–8: The Site Parameters Plan is identified as a plan for approval and the application is stated to adopt a Rochdale Envelope approach assessing maximum parameters/ the reasonable worst case.

	Site Parameters Plan BIC-DR-AR-100107-P01: Identifies an "Operational Development Zone up to 12m high measured from existing site levels". It is not clear what development the additional height is intended to accommodate. If permanent development can extend to 12m, the landscape and visual assessment has not assessed the full development envelope sought.
Vegetation Retention / Clearance and Visual Screening (EIA Screening Request / Other Documents)	EIA Screening Direction Request, Landscape and Visual Impact, p.20; Landscape and Visual Statement, paras 5.3.1–5.4.1 and 6.1.2, pp.24–26: The Screening Request identifies protection of the existing treeline, retention of hedgerows and retention of existing vegetation as a natural form of screening as embedded design mitigation. The LVS also relies on existing vegetation to contain and filter views and concludes that the likely visual envelope is limited by vegetation and built form. EIA Screening Direction Request, Access, Traffic and Transport, pp.7–8; Planning Proposal Statement, para 1.5, pp.6–7 and paras 7.41–7.45, p.74; Site Parameters Plan BIC-DR-AR-100107-P01: The application allows for vegetation clearance; the Screening Request refers to vegetation removal / trimming along the B4011; and the Planning Proposal Statement states that Category B trees will be retained only "wherever possible", with the Arboricultural Impact Assessment to follow under condition. The Site Parameters Plan does not identify specific vegetation to be retained. The extent of screening relied upon by the landscape and visual assessment therefore cannot currently be confirmed.
Long-distance Visibility (EIA Screening Request / Landscape and Visual Statement)	EIA Screening Direction Request, Landscape and Visual Impact, p.18: Describes views as largely contained to the local area and states that no longer-distance views are available due to intervening vegetation. Landscape and Visual Statement, paras 4.2.1 and 4.3.1 and Plates 5–7, pp.20–22: Identifies longer-distance visibility from the surrounding landscape, including the southern edge of Ambrosden and elevated views from Muswell Hill and Arncott Hill. Plate 6 specifically records the Site as visible within the panoramic view from Muswell Hill.
Existing Built Form Envelope / Development Footprint (Landscape and Visual Statement)	Landscape and Visual Statement, paras 1.3.1 and 5.2.2, pp.6 and 23 Identifies the primary embedded mitigation as locating the proposed modular buildings within the "existing built form envelope" and refers to replacement of redundant Nissen huts. Landscape and Visual Statement, para 5.2.2, p.23; Site Parameters Plan BIC-DR-AR-100107-P01 The proposals also introduce modular development onto the northern storage / hardstanding area and the Site Parameters Plan allows operational development across a wider area than the existing building footprints. The description of the development as being contained within the existing built form envelope therefore does not explain the extent of development permitted by the parameters.
Lighting / Landscape and Visual Effects (EIA Screening Request / Planning Proposal Statement)	EIA Screening Direction Request, Lighting, pp.41–42 States that the current scheme does not include details of lighting provision and that impacts from operational lighting are unknown, but then concludes that there will be no likely significant effects. Planning Proposal Statement, para 4.9, p.31 and para 7.21, p.68 The Site is proposed to operate on a 24-hour basis, 365 days per year, while the detailed lighting scheme is to be secured by condition. The basis for concluding no likely significant night-time landscape or visual effects before the lighting design is known is therefore unclear.
Ecological Survey Completeness / Conclusions (Preliminary PEA / EIA Screening Request)	Preliminary Ecological Appraisal, section 2.4, pp.7–8 and section 5.0, p.33 The PEA states that access to parts of the Site and adjacent woodland was restricted, that building inspections were external only, and that the survey cannot be considered as a comprehensive assessment of the ecological interest of the Site. It recommends further targeted surveys / checks before avoidance, mitigation and licensing requirements can be fully informed. EIA Screening Direction Request, Ecology, pp.27–28; Planning Proposal Statement, paras 7.34–7.35, pp.72–73 The Screening Request concludes that no likely significant ecological effects are anticipated, subject to the further survey and mitigation measures in the PEA. The Planning Proposal Statement also says the PEA and HRA provide a clear basis for concluding that unacceptable ecological effects can be avoided. These conclusions are therefore conditional on survey and mitigation work which has not yet been completed.

Protected Species Survey Requirements (Preliminary PEA / Planning Proposal Statement)	Preliminary Ecological Appraisal, section 5.0, p.33 Recommends targeted surveys for hazel dormouse, Barn Owl, breeding birds, GCN, reptiles and terrestrial invertebrates; pre-construction checks for badger and water vole; and further bat survey where relevant. Planning Proposal Statement, para 7.34, pp.72–73 The Planning Proposal Statement lists further work for the SSSI, badger, hazel dormouse, bats, breeding birds, GCN / common amphibians and reptiles, but does not explicitly carry forward the PEA recommendations for Barn Owl, terrestrial invertebrates or the water vole pre-construction check. It is therefore unclear whether all of the PEA survey requirements are intended to be secured.
Arncott Bridge Meadows SSSI / Hydrological Pathway (NE Advice / EIA Screening Direction)	Natural England Discretionary Advice Service letter, 23 July 2026, p.1 States that hydrological connection between the Site and Arncott Bridge Meadows SSSI cannot be ruled out, that the project must demonstrate it will not alter the existing hydrological regime, and asks to be re-consulted once the relevant information has been obtained. EIA Screening Direction – Written Statement, p.10 States that Natural England subsequently clarified its advice on 11 August 2026 and responded on 13 August 2026 that it was content for the development to move forward, while also acknowledging that the final foul water and surface water drainage strategies have yet to be confirmed. The 11 and 13 August Natural England correspondence referred to in the Written Statement does not appear as part of the application documents, so the basis for this later position cannot be confirmed.
Habitat Loss / Mitigation (EIA Screening Direction Request)	EIA Screening Direction Request, Ecology, pp.27–28 Identifies potential habitat loss and fragmentation, including loss of semi-improved grassland and potentially small areas of deciduous woodland, lowland meadow and ruderal / ephemeral vegetation. It states that site clearance will be avoided wherever possible and compensation provided where avoidance is not feasible. Planning Proposal Statement, paras 7.34–7.35, pp.72–73 Concludes that the proposal can be brought forward to avoid unacceptable ecological effects and that sufficient mitigation will be incorporated, but the final layout, extent of habitat loss and associated compensation / enhancement measures are not defined in the submitted material. The ecological conclusion is therefore reliant on mitigation which remains to be established through later design stages.
Demolition vs. No Demolition (EIA Screening Direction Request)	The text states that Nissen hut structures are proposed to be demolished/dismantled and existing concrete slabs will be retained. However, in the same section, a sentence contradicts this by stating: "of the development there is expected to be no demolition of existing buildings on the site."
Site Usage Baseline (EIA Screening Direction Request)	Pages 2 and 3 state the site is currently an active MOD base storing military equipment and cars. Page 4 directly contradicts this, describing the site as "unused (with exception to small scale storage of cars, within a small shed)". Page 13 contradicts both by calling it a "non-operational former RAF site".
Existing Building Renovation (Phase 2) (EIA Screening Direction Request)	Main text explicitly states that "no existing buildings will be renovated due to their poor condition". However, Phase 2 of the proposed development includes a "Gym facility within an existing building."
Road & Location Measurements for B4011 (EIA Screening Direction Request)	The B4011 road is described on page 3 as running "Directly west of the Site". Conversely, page 6 states that the B4011 runs "approximately 2.9 km north of the Site's northern boundary and 10.7 km south of the Site's southeast corner."

Flood Risk (EIA Screening Direction Request)	Page 7 reports that the Environment Agency map displays flooding from rivers and seas as "very low risk" for the entirety of the site. In contrast, page 7 and page 12 note that "large areas of Flood Zone 2 and 3" are present on the site's northeastern corner.
Site Detainment vs. Freedom of Movement (EIA Screening Direction Request)	The proposed site is explicitly described as operating as non-detained, meaning SUs are free to leave on foot at any time. However, the report also states that high-visibility vests will be provided to discourage foot exit, citing safety concerns due to a lack of footpaths and aiming to direct users exclusively to shuttle buses.
Operational Self-Sufficiency vs. Reliance on External/Local Services (EIA Screening Direction Request)	The site is described as "self-sufficient" and "designed to be largely self-sufficient" with on-site healthcare, catering, and recreation to minimise off-site visits. Elsewhere, it acknowledges: SUs will use shuttle buses to access external off-site amenities and local community facilities (e.g., libraries, shops, public spaces). The site does not provide hospital care, creating an increased demand on local NHS secondary/emergency care (John Radcliffe Hospital) and local ambulance services.
Air Quality Assessment & Traffic Emissions (EIA Screening Direction Request)	The report asserts that the development will not result in a material increase in vehicle emissions and that post-construction air quality thresholds for NO_2 will not be exceeded. However, it simultaneously admits that baseline and operational phase dispersion modelling was not undertaken, and that specific operational traffic data for the site was unavailable (relying instead on estimates and data from RAF Wethersfield).
Surface Water Flooding & Drainage Constraints (EIA Screening Direction Request)	The report initially states that surface water management is "not anticipated to present a significant constraint at this stage" because on-site drains flow northward away from the site. However, it later explicitly acknowledges that: Current site drainage pumps are broken, causing frequent surface water flooding across northern access roads and eastern areas. Increased waste outflows from the proposal could increase the scope for surface water flooding on-site without intervention. The drainage design relies on preliminary assumptions with "inherent outstanding uncertainties within the final RIBA Stage 2 design"
Ecological Survey Completeness & Impact Conclusions (EIA Screening Direction Request)	The report repeatedly concludes that there will be "no likely significant effects" on ecology. However, it simultaneously discloses that: The initial survey (PEA) was not fully comprehensive because access to key areas (Barracks, woodland, boundaries) was restricted. Recommendations for crucial species-specific assessments (Hazel Dormouse, Barn Owl, Breeding Birds, Great Crested Newt, Reptiles, Terrestrial Invertebrates, Bats, Otter, and Water Vole) have not yet been completed.
Lighting Impacts (EIA Screening Direction Request)	The report concludes that there will be "no likely significant effects" regarding operational lighting. Yet, it acknowledges that the current scheme design does not include details of lighting provision, the strategy was impossible to assess during RIBA 2, and therefore "impacts from operational lighting are unknown".
Historical Contamination & Ground Risk (EIA Screening Direction Request)	The report concludes no significant ground condition effects exist, despite identifying two key unquantified site constraints: poor-quality concrete causing differential settlement, and historical contamination from past uses (unspecified depots, railway sidings, fuel tanks, and electrical substations). It notes that targeted site investigations to identify contamination extents have not yet been carried out.
Archaeology & Buried Heritage	The report asserts that no significant effects on archaeological assets are anticipated during construction or operation. However, it admits that central site excavations could disturb buried

(EIA Screening Direction Request)	archaeology, but "no site investigations are currently planned, as further information is needed to identify the extent of the area that could be affected".
Substations (EIA Screening Direction Request)	"The on-site substations may represent a source of noise, with the existing substations" – first mention of substations, implies substations are proposed as well as existing. Not addressed in the project description or assessment of effects.
Trees, Highways Access, Landscape and Visual Impact – Contradictions (EIA Screening Direction Request)	"Subject to consideration being given for the Category B and C trees within the detailed design stage, no likely significant effects are expected" Impacts on trees are not fully defined, can't draw conclusion of no significant effects to Trees. "Furthermore, the scheme design is currently being developed to minimise any changes to views from the wider landscape and reduce impacts on the existing landscape character of the Site and its surroundings. The embedded design mitigation includes: • Protect the existing treeline surrounding the Site; • Retaining existing hedgerows wherever possible; • Provide footpaths within the Site and open space; and • Protect amenity of nearby residents by retaining the existing treeline and vegetation as a natural form of screening." Subject to the above and knowing what tree removal is needed. Also transport section talks about - page 7 - "overgrown vegetation along the grassed verge will be removed to delineate the kerbs and carriageway" so reducing screening of the site
Site Clearance and Highways Access, Landscape and Visual Impact – Contradictions (EIA Screening Direction Request)	"Site clearance will be avoided wherever possible and kept to a minimum where necessary. Where avoidance is not feasible, appropriate compensation measures will be implemented" As above comment
A description of the aspects of the environment likely to be significantly affected – requirement of the EIA Regulations for Screening Assessments (EIA Screening Direction Request)	Ecology: The Preliminary Ecological Appraisal (PEA) was restricted in geographical scope and recommends 9 additional targeted species surveys (including bats, dormice, Great Crested Newts, and reptiles) that have not yet been carried out. Air Quality & Traffic: No baseline or operational dispersion modelling was conducted for air quality. Operational traffic data was estimated using proxy data from a different site (RAF Wethersfield). Ground & Water: Known historical site contamination and broken drainage pumps (which cause active surface flooding) are noted, but targeted ground and hydraulic investigations remain incomplete.
Features or measures envisaged to avoid/prevent significant adverse environmental effects – requirement of the EIA	While standard mitigation frameworks are suggested (such as implementing a CEMP, CTMP, and SuDS drainage strategy), many of these measures rely on unconfirmed data or pending technical assessments.

Regulations for Screening Assessments (EIA Screening Direction Request)	
Waste (EIA Screening Direction Request)	"The Proposed Development would mainly produce typical domestic waste streams" No reference to waste associated with health provision on site: "The provision of onsite healthcare space will help to reduce demand on existing local services and locations, including minimising inappropriate attendance at emergency departments"
Road Traffic Data (EIA Screening Direction)	"Site staff commuting is estimated in three shift patterns and two of which overlap, totalling 260 vehicle movements in any 24-hour period. Service vehicle movements are estimated as 192 per day (including 43 Light Goods Vehicle and 53 Heavy Goods Vehicles in two-way trips). Minibus SU arrivals are estimated as 2 vehicles per day. Taxi SU departure will be starting after the first period of SU occupancy has expired from the site opening (occupancy likely set at 90 days), which will be up to 30 individual trips per day. Number of shuttlebus transport for SUs to use off-site facilities have not been estimated, but will include longer and shorter trips for SUs depending on which facilities are to be accessed" This data has not been considered for transport, air quality or noise and vibration effects – as the data is available, these topics should have considered this in far more detail than what is presented in the Screening Direction Request.
Groundworks (EIA Screening Direction)	"Noting the build is modular and requires little intrusive groundworks" But below ground drainage and attenuation tanks are proposed.
Air Quality Impact (EIA Screening Direction)	"Air emissions during operation phase are likely to arise from the on-site generator compounds…" The Air Quality report does not make any reference to combustion plant and so consideration as to the likelihood for any air quality effects associated with the on site generator compounds has not been given.
Noise Impact (EIA Screening Direction)	The proposed uses include "open space and recreational areas", which along with supporting infrastructure (e.g. power generation, ventilation systems etc) can be expected to result in new environmental noise emissions. No consideration has been given to the impact of these uses of noise sensitive receptors.
Ecological Impact (EIA Screening Direction)	The screening request and screening direction do not adequately address the implications of the proposed development on biodiversity receptors such that it can fully inform the decision making process. Inconsistencies in the site boundary forming the assessment give rise to uncertainties on the baseline and impacts whilst the failure to fully implement best practice survey guidance and the absence of targeted species survey information fails to adequately address the risk of impact and mitigation requirements in relation to harm to biodiversity as required by planning policy and the associated legal requirements for the relevant species. Further, there is an absence of information on how the development proposals can deliver a policy compliant biodiversity net gain.

APPENDIX 2 – SUMMARY OF KEY TRANSPORT ASSESSMENT REDACTIONS

Following a review of the submitted material, the below table summarises headline observations about the redactions, what the redacted information is likely to have been, and Value Retail's transport consultant's view of what impacts this could have on any assessment of effects.

Location in TA	Information Likely to Have Been Redacted	Potential Impacts on Assessment
3.2.4	Description of use of land to the north of the site	Unlikely to result in a material impact
3.10.5 – 3.10.6	Summary of ATC surveys at RAF Wethersfield	No meaningful assessment of traffic impacts is possible without an understanding of the traffic generating potential of a site under similar use
4.1.6	Description of phasing plans	An understanding of phasing is required to understand whether the future years tested are appropriate. If facilities such as the shop were to be delivered in later phases then there is a risk of increased demand for off-site travel in early phases.
4.2.1 and table 4-1	Employee numbers and hours of operation	No assessment of the impact of staff travel is possible without this information.
4.3.1	Details of access strategy	It is unclear from the remaining text in this section which of the two existing accesses will be utilised.
4.5.1	Description of swept path analysis	Undetermined.
4.5.4	Description of booking system for service user arrivals	Undetermined.
4.6.6	Details of car parking provision	In the absence of a complete description of parking arrangements or plans illustrating provision, it is not possible to assess whether suitable arrangements have been made.
4.7.1	Emergency access arrangements	The unredacted information does not allow a reader to assess whether suitable emergency access provisions have been made.
5.3.2 – 5.3.12	Details of the number of service users and associated travel demands	No assessment of the impacts of service user, staff and servicing related travel is possible without, at minimum, an estimate of the total number of trips expected to be made per day or in key time periods.
5.3.14 – 5.2.23	Servicing and staff travel forecasts	
Summary	Various redactions throughout	Undetermined
Appendix A	Proposed site plan	The safety and suitability of transport aspects of the site layout cannot be assessed without sight of a proposed layout.
Appendix C	Wethersfield traffic survey	See above
Appendix D	Parking accumulation calculations	See above
Appendix E	Employee trip calculations	See above
Appendix F	Traffic flow diagrams	An adequate review of the traffic impact of the proposals is impossible without this information.