[redacted]

From: [redacted]
Sent: 20 September 2026 21:18
To: Crown Casework
Subject: PCU/RARE/C3105/3378843 - Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

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Good Evening,

My comments on the above application were shared with Cherwell Council, however I am also sharing directly to this address to ensure they are received.

Formal Objection to PCU/RARE/C3105/3378843

The application as submitted whereby many of the reports are marked as preliminary resembles a pre-application submission rather than a full application. Based on the number of outstanding or incomplete assessments and surveys, this application is premature. An application of this scale and nature should be supported by full assessments, rather than the preliminary documents that have been submitted with the application. The date of reports and correspondence demonstrate that the application has been in progress/planned for many months, so it is not clear why a full application pack has not been prepared and submitted.

The application should not be approved in the absence important information that is key to the determination of the application and cannot be suitably conditioned.

The following are material considerations that have not been addressed as part of the application:

Absence of site notice(s):
This is a standard requirement/obligation of all applications.

Absence of site plan clearly showing the proposals:
There is no indication of the proposed height, massing and density of the proposals and as such no assessment of the impact of the proposals.

Temporary Application:
The application is for a temporary ten-year period but includes the demolition of the existing historic structures on the site. A temporary consent requires the previous use and infrastructure/buildings to be returned at the end of the temporary period. How will this be possible when the historic structures on the site are being demolished and lost?

Current Activity on site:
Lights have been installed and are operational on the site. Is this to prevent bats and other wildlife roosting/hibernating across the site? Have works commenced ahead of the determination of this application?

Site Conditions / Contamination:

No assessment has been undertaken of the existing structures and buildings on site. Given the age of the buildings, there is a high chance that asbestos materials were used in their construction. The report submitted with the application notes that no asbestos register was provided and that the buildings on site are likely to have been constructed with Asbestos Containing Materials (ACM).

There are no details around any contamination in the ground or across the site. The preliminary geo-environmental and geo-technical assessment submitted with the application notes inadequacies with the report submitted. Section 1.4 (Limitations) that the recommendations and opinions expressed in the report are based on information obtained as part of a desk study or provided by others. However, the two previous borehole investigations are not appropriate given the size of the site and the proposals, but the information has been redacted from the report. It is not clear why this information has been redacted. The report concludes with recommendations for site wide testing and sampling. This needs to take place prior to this application being determined to ensure the impacts and any mitigation measures are fully considered.

Again, given the site's use and history there is a high chance of contamination being present in the form of PFAS, oils and potential ammunition. Whilst some of the application documents state that the ground will not be broken, any drainage works will require the breaking of ground and exposure of contaminants in the soil. This also has the potential to impact on the nearby SSSI. The Constraints and Mitigation section of the contamination report demonstrate that the variable ground conditions and poor concrete have led to differential settlement on the site. The mitigation is for targeted investigations to take place to establish the ground bearing pressure and where required design and implement ground improvement measures. Such works will require the breaking of ground which needs to be fully assessed as part of this application. Again, the potential impact on the SSSI also needs to be fully assessed.

Ecology:
The submitted preliminary ecology report identifies requirements for further surveys for protected species (eg Bats, Hazel Dormouse and Great Crested Newts).
The survey windows are not currently open and as such the application should either be refused or left undetermined until the information from the surveys has been collected and fully analysed. The survey windows are also beyond the launch date of the facility.

The impact of the proposals on Ancient Woodlands (Piddington Wood) has not been assessed.

Impact on SSSI (Arncott Bridge Meadows):
The impact on the nearby SSSI has not been established. The correspondence included in the application clearly shows that Natural England have requested further information. An approval of the current application would be premature as the impacts on the SSSI need to be fully understood.

Heritage and Conservation:
The Heritage and Conservation impacts have not been fully assessed. The report submitted in support of the application identified the site as being important due to it representing a rare example of World War Two infrastructure. The report submitted with the application notes that numerous storage hangars and much of the original infrastructure remain. The site is described as the "outstanding example in the UK of a bulk storage depot built during the Second World War, designed to be fully integrated into rail and road transport networks". However, there is no further assessment of the existing site infrastructure or assessment of the impacts of these buildings being lost. No assessment if significance has been undertaken which should be required given the importance of the buildings as noted in the report submitted with the application.

Drainage:
The report submitted with the application concludes that the strategy "remains subject to a number of assumptions owing to incomplete site information and the absence of several key design inputs". It is not clear why this information is outstanding or missing, but the details need to be submitted as part of the application so that the proposals and any associated impacts (eg on the SSSI) can be fully assessed. The report includes a significant list of recommended actions for the design to be finalised, unfortunately some of the foul drainage items have been redacted. It is not clear why text relating to recommendations for the drainage design have been redacted.

Traffic:
It is not possible to comment on the traffic impact of the proposals as unfortunately this information has been redacted. This information should not be considered as sensitive and should be made available for public review prior to the determination of the application.

Summary:
Despite the claims in the Planning Statement the site and application are not compliant with Local or National planning policies. The application is incomplete with key information missing. As such it is not possible to agree with the applicant's position that the proposals are acceptable and that the application complies with local and national planning policies.

The length of consultation is inappropriate for an application of this scale. Whilst this is not the place to dispute the basis of the need or 'urgency' argument that has been pursued by the applicant, many of the application documents refer to a submission being made much earlier in the year. The fact this did not happen is not a reason for the current application to be considered urgent and to adopt a short consultation period.

As noted earlier, some of the surveys required to fully assess the ecological impacts of the proposals cannot be undertaken until 2027. These surveys need to occur prior to the application being determined so the applicant's timeline for bringing the proposals into use is already unachievable. It is not clear why the necessary surveys were not undertaken prior to the submission of the application (when survey windows were open). Was this however because the surveys would show the presence of, and severe/unacceptable impact on, species making the proposals unacceptable?

As above, any determination of the current application would be premature. There is a significant amount of information that is required to properly assess the proposals, which cannot be suitably conditioned. Any approval would be open to Judicial Review challenge as a result.

I am happy to discuss any of the above in further detail.

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