From: [redacted]
To: Crown Casework
Cc: wpwsobjection@gmail.com
Subject: Formal Objection – PCU/RARE/C3105/3378843 – Insufficient Ecological Evidence and Protected Species Risk at MOD Bicester Site A
Date: 12 September 2026 12:35:56

[redacted]

Dear Sir/Madam,

FORMAL OBJECTION – URGENT CROWN DEVELOPMENT APPLICATION
MOD Bicester Site A – Application Ref: PCU/RARE/C3105/3378843

I am writing to formally object to the above application and ask that the Secretary of State **refuse** the application, or at minimum require the outstanding ecological evidence to be provided before any determination is made.

My objection is not based simply on the presence of wildlife on or around the former Garrison. It is based on a much more fundamental concern:

The evidence currently submitted does not appear sufficient to establish that this development can proceed without unacceptable impacts on European protected species and other protected wildlife.

In my view, this is a material issue which must be resolved before planning permission can lawfully be granted.

1. The applicant's own ecological assessment admits that it is not comprehensive

The Preliminary Ecological Appraisal (PEA) submitted with the application expressly acknowledges significant limitations.

It states that only a single ecological visit was undertaken and that the assessment cannot be considered a comprehensive assessment of the ecological interest of the site.

More importantly, the PEA itself identifies the need for further targeted surveys for:

- Great crested newts;
- Reptiles;
- Barn owls;
- Breeding birds;
- Hazel dormice; and

- Terrestrial invertebrates.

It also identifies trees and buildings with potential bat-roost suitability and recommends further survey work where appropriate.

This is not a technicality.

The application proposes a major redevelopment accommodating up to 1,256 people, involving demolition, new modular buildings, roads, lighting, parking, security infrastructure, wastewater infrastructure and other associated works.

The Secretary of State therefore needs to be satisfied that the ecological consequences of that development have actually been established.

At present, the applicant's own documentation says they have not.

2. The Great Crested Newt issue is particularly serious

There is unusually strong evidence that Bicester Garrison is an important great crested newt site.

NatureSpace describes Bicester Garrison as a “stronghold for great crested newts.”

Its published case study from August 2022 records that four ponds at the Garrison were subsequently surveyed and great crested newts were found **present and breeding in all four**, with **59 adult newts recorded in one pond alone**.

https://naturespaceuk.com/case_study/bicester-garrison-oxfordshire/

The project subsequently created additional ponds for the long-term benefit of the population.

This is therefore not a hypothetical possibility based solely on habitat suitability.

There is documented evidence of a significant breeding population of a European protected species on the wider Bicester Garrison estate.

Natural England's current GCN planning guidance states that a survey should be sought where historical records suggest GCN may be present or where suitable ponds occur within 500 metres of development, particularly where suitable terrestrial habitat exists. It also states that absence of a record does not establish absence of GCN.

The submitted PEA itself identifies GCN as requiring further targeted investigation.

I therefore consider it inappropriate to grant permission before that investigation has been completed.

3. This is exactly the type of situation in which Natural England says further surveys should be obtained before determining the application

Natural England's protected-species planning guidance is particularly clear.

It states that planning authorities should:

> ensure developers use suitably qualified ecologists and undertake surveys at the appropriate time of year;

and should:

> not decide planning applications until all the necessary surveys have been received.

The guidance further states that planning permission can be refused where surveys do not provide enough evidence to assess the likely negative effects on protected species.

The guidance also says that planning conditions should **not normally be used simply to obtain the necessary ecological surveys after permission has been granted**, because the full impact of the development on protected species should be considered before permission is given.

That appears directly relevant here.

The applicant's own PEA identifies surveys that remain outstanding.

Those surveys should therefore not simply be deferred until after permission.

4. The ecological records search requires urgent clarification

The PEA states that its biological records search was obtained from the **Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC)** and the NBN Atlas.

However, the application site is in Oxfordshire.

The **Thames Valley Environmental Records Centre (TVERC)** is the Local Environmental Records Centre for Oxfordshire and Berkshire and holds the relevant Oxfordshire species, habitat and designated-site information. TVERC specifically states that its data-search service is intended to inform planning and development decisions in Oxfordshire.

TVERC also specifically offers a Great Crested Newt data package containing GCN occurrence records, suitable habitat information and NatureSpace GCN risk-zone information.

Oxfordshire County Council itself identifies TVERC as the relevant local biological records centre for Oxfordshire.

I am not asserting that the use of BMERC automatically invalidates the application.

However, given the known ecological importance of Bicester Garrison and the specific GCN concerns identified above, the Secretary of State should require the applicant to answer a very straightforward question:

Was a TVERC biological records search undertaken for Site A and its surrounding area?

If it was, that search should be disclosed and incorporated into the ecological assessment.

If it was not, I believe the ecological assessment is incomplete.

This is especially important because TVERC states that it holds millions of species records for Oxfordshire, including protected and notable species.

5. The development cannot be assessed simply by looking at the red-line boundary

A particularly important issue with GCN is that their use of the landscape is not confined to the breeding pond itself.

Natural England's guidance specifically identifies ponds within 500 metres of development where suitable semi-natural habitat provides connectivity as relevant to GCN assessment. It also identifies grassland, scrub, woodland and hedgerows as potential terrestrial GCN habitat.

Consequently, it is insufficient simply to establish whether a known breeding pond sits inside the Site A red-line boundary.

The assessment needs to establish:

- the location of ponds within the relevant survey radius;
- whether they support or could support GCN;
- the terrestrial habitat between those ponds and Site A;
- whether GCN use the proposed development area;
- whether construction activities could interrupt movement routes;
- whether lighting could affect commuting/foraging habitat;

whether drainage and wastewater infrastructure could affect aquatic habitats; and

- whether the proposed development could adversely affect the wider GCN population.

Given the known GCN population on the Garrison, these questions are particularly important.

6. The proposed development could cause both direct and indirect ecological impacts

The scale of the proposal creates potential impacts well beyond the footprint of individual buildings.

The development involves demolition, construction, new accommodation, roads, parking, lighting, security infrastructure, wastewater infrastructure and associated landscaping.

Potential impacts include:

- destruction or degradation of terrestrial habitat;
- disturbance of protected species during construction;
- destruction or disturbance of resting places;
- interruption of movement routes;
- artificial lighting affecting bats and other nocturnal species;
- impacts on ponds and drainage pathways;
- changes to hydrology;
- vegetation clearance;
- increased human activity and disturbance; and
- cumulative impacts across the wider Garrison.

The submitted PEA itself identifies several of these ecological sensitivities.

It therefore seems premature to conclude that the impacts are capable of being adequately mitigated when the surveys required to determine the actual species presence and population significance have not yet been completed.

7. The GCN issue may also have licensing implications

Great crested newts are a European protected species.

Natural England confirms that it is an offence to deliberately kill, injure, disturb or capture them, or deliberately destroy their eggs.

Where development affects European protected species, Natural England's guidance identifies three licensing tests, including whether there is no satisfactory alternative that would cause less harm and whether the development would maintain the long-term conservation of the species/population.

It follows that the Secretary of State should not simply assume that any future ecological problem can be dealt with through a licence.

The evidence necessary to establish the likely impact and appropriate mitigation should inform the planning decision itself.

8. The application should not be treated as acceptable subject to a future ecological condition

This is, in my view, one of the most important points.

The issue is not whether the applicant could potentially produce an acceptable ecological mitigation scheme at some point in the future.

The issue is whether **the application before the Secretary of State currently contains sufficient evidence to establish that the development is acceptable.**

Natural England's guidance indicates that where the necessary information is absent, further information should be obtained and that planning permission can be refused where surveys do not provide enough evidence to assess likely negative effects.

Granting permission first and attempting to resolve fundamental protected-species questions afterwards would effectively reverse that process.

9. Requested action

I respectfully ask the Secretary of State to treat the following as material reasons why this application should not presently be approved:

1. Insufficient ecological evidence
The applicant's own PEA acknowledges that it is not a comprehensive ecological assessment.

2. Outstanding protected-species surveys
The PEA recommends further surveys for GCN, reptiles, barn owls, breeding birds, dormice and terrestrial invertebrates.

3. Significant documented GCN population

Bicester Garrison is documented as a GCN stronghold, with breeding GCN recorded in multiple Garrison ponds, including 59 adults recorded in one pond.

4. Potentially inadequate local biological-record information
The PEA identifies BMERC as its biological records source despite TVERC being the Local Environmental Records Centre for Oxfordshire. The applicant should demonstrate that the appropriate Oxfordshire records have been obtained and considered.

5. Potential impacts extending beyond the development footprint
GCN and other protected species may use connected habitats and ponds outside the red-line boundary, meaning the ecological assessment cannot reasonably be limited to the immediate building footprints.

6. Inability to demonstrate compliance with protected-species requirements
Until the outstanding surveys and mitigation strategy are completed, there is insufficient evidence to establish that protected species will not be harmed or disturbed.

Conclusion

I appreciate that the Urgent Crown Development procedure reflects the Government's stated need for additional asylum accommodation and that the application is being considered on grounds of national importance and urgency.

However, the Government's own factsheet makes clear that submitting this planning application does **not predetermine the outcome** and that the proposal remains subject to the planning process and relevant assessments and approvals.

Urgency should not remove the requirement for the Secretary of State to have sufficient evidence to make a lawful and properly informed planning decision.

In this case, there is:

a documented protected-species population on the wider Garrison;

known suitable habitat;

a specific recommendation for further GCN surveying;

other outstanding protected-species surveys;

a question over whether the appropriate Oxfordshire biological records were obtained; and

a development of substantial scale capable of causing significant direct and indirect ecological impacts.

Taken together, I believe these matters constitute a significant evidential gap which should

be resolved **before** planning permission is granted.

I therefore respectfully request that the Secretary of State:

1. Refuse the application on the basis that the submitted ecological information is insufficient to demonstrate that the development would not result in unacceptable impacts on protected species; or, alternatively,

2. Require the applicant to undertake and submit the outstanding protected-species surveys, obtain and disclose the relevant TVERC records, properly assess the GCN population and associated ponds/habitats, and submit a detailed mitigation/licensing strategy before the application is determined.

I would also ask that this representation is formally recorded against application **PCU/RARE/C3105/3378843** and given full consideration when the Secretary of State determines the application.

Yours faithfully,

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