

Case Officer: Rob Duckworth

Applicant: Home Office (application to the Secretary of State/MHCLG)

Proposal: Urgent Crown Development application for Full planning permission for a temporary ten-year change of use and phased non-detained asylum accommodation for up to 1,256 service users, with demolition, modular buildings, health and welfare facilities, wastewater treatment, access, security, parking, staff facilities, open space and recreation at MOD Bicester Garrison Site A, Piddington

Ward: Launton and Otmoor

Councillors: Cllrs Dr Timothy Faltermeyer, Julian Nedelcu and Alisa Russell

Reason for Referral: Planning Committee is asked to agree Cherwell District Council's formal consultation response to the Secretary of State / MHCLG on an Urgent Crown Development application of major scale and significant public interest. CDC is not the determining authority.

Expiry Date: 17th September 2026 **Committee Date:** 16th September 2026
16:00

1. PURPOSE AND STATUS OF THIS REPORT

- 1.1. This report enables Planning Committee to consider the land-use and planning effects of the proposal and to inform Cherwell District Council's formal response to the Secretary of State.
- 1.2. The Committee is not determining the application. The Secretary of State is the determining authority under sections 293B and 293C of the Town and Country Planning Act 1990. Cherwell is the relevant local planning authority and mandatory consultee. The report therefore recommends the position the Council should communicate to the SoS; it does not purport to grant or refuse permission.
- 1.3. The covering report published with the agenda on 8 September explained that the submission and consultation responses were still being reviewed. This document is the detailed officer assessment, and has been made with all the material made available to the Council up to 10 September 2026. Any further substantive technical advice received before the Committee meeting will be issued as written update or verbally, and anything submitted prior to the Government's deadline of 17 September will be reported by addendum and reflected under the delegated authority recommended below

2. RECOMMENDATION

2.1. That Planning Committee:

- **endorses a formal objection** 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;
- **requests that no determination** is made until the responses of relevant statutory and specialist consultees including the Environment Agency, Natural England, Oxfordshire County Council, NHS bodies and relevant utility providers, have been received and fully considered
- **requests that the Secretary of State** requires the information in section 15.50 of Appendix 1 (this document), publishes all non-sensitive additional material, makes appropriate arrangements for genuinely sensitive material to be independently examined, and provides a further reasonable opportunity for the Council, consultees and the public to comment before determination;
- **confirms that urgency and national importance** are acknowledged as considerations of substantial weight, but do not displace the need for an informed planning judgment or justify transferring questions of basic feasibility to conditions;
- **requests that if decision is made by MHCLG that it should be refused**, because the Council cannot be satisfied based on the information submitted thus far, that the development would be safe, sustainable, properly serviced or acceptable in design, landscape, community, transport, drainage, ecology and amenity terms; and
- **authorises the Assistant Director - Planning, in consultation with the Chair or Vice-Chair of Planning Committee**, to finalise and submit the Council's response, including necessary minor or technical amendments, late consultee advice and the protective controls, provided the substance of the Committee's resolution is maintained.

3. EXECUTIVE SUMMARY OF OFFICER ASSESSMENT

- 3.1. The national need for additional asylum accommodation, the statutory responsibilities of the Home Office, reduction of reliance on hotels and reuse of previously developed defence land are material benefits. The Secretary of State has already accepted that the proposal should enter the urgent Crown procedure. Those matters attract substantial positive weight.
- 3.2. The current submission does not answer whether this particular development, on this site and in this form, is acceptable. The application is expressly described as a full application, yet the public drawing set comprises only a location plan, existing plan, demolition plan and a broad parameters plan. There is no proposed site layout, floor plan, elevations, sections, levels plan, roof or plant plan, landscape plan, lighting plan or detailed access and servicing layout. The single parameters plan would allow operational development up to 12 metres high across a broad zone

without identifying where the accommodation, healthcare, recreation, waste, energy, security, roads or wastewater infrastructure would be placed.

- 3.3. Omissions are not a matter of presentation alone. It prevents reliable assessment of built form, landscape and visual effects, living conditions, daylight, fire separation, emergency access, drainage, flood safety, trees, habitats, archaeology, contamination, security, noise, odour, pedestrian routes, parking and servicing.
- 3.4. Cherwell's ordinary validation checklist for full non-residential development over one hectare requires proposed site/block plans, elevations and floor plans. While the urgent Crown procedure has its own requirements and the Secretary of State has accepted the application, this is a useful local benchmark: the application would not be validated by Cherwell as a full application in its present form.
- 3.5. More importantly, the urgent Crown guidance itself requires all plans, drawings and information necessary to describe the development and sufficient information for an informed planning judgment. Administrative validation does not establish planning sufficiency. The Crown Casework Team is expressly able to request further information.
- 3.6. There are material inconsistencies in the scheme said to have been assessed. The parameters plan permits buildings up to 12 metres tall. However, the Secretary of State's EIA Screening Direction expressly assesses modular accommodation at no more than two storeys / 6 metres high, and the applicant's landscape case likewise relies on units no greater than 6 metres. The Screening Direction also relies on greenfield runoff rates and no additional hardstanding, whereas the submitted drainage material records that Phase 1 cannot achieve greenfield restriction in the lowest part of the site and refers to approximately 440m² of new impermeable surfacing. These are significant details: the permission, the environmental screening and the technical assessments must relate to the same maximum development.
- 3.7. The Council's Landscape Officer raises no objection in principle, but only on the assumptions that the assessed scale and development envelope are observed and the vegetation providing containment is retained and reinforced. The Urban Design Officer is satisfied that contextual and functional requirements have been considered 'at this outline stage'. Those responses are important, but their responses stress the central issue: they do not establish that an undefined 12-metre high full application is acceptable.
- 3.8. The potential effect on the nearby settlements of Piddington and Upper Arcott is a central, and very controversial planning issue. The facility would accommodate a population substantially larger than either. Future residents would be free to leave the accommodation to use services and facilities elsewhere, with little information provided as to how they could travel sustainably between the facility and services elsewhere. Whether all 1,256 people leave together is not the main issue; it is the repeated, cumulative pattern of individuals and small groups travelling at different times, including evenings and periods when transport is unavailable, and the effect on unsafe rural roads, local public space, services, community cohesion and residents' wellbeing.

- 3.9. The short representation period is lawful in the sense that the urgent procedure permits an expedited timetable, but ten calendar days is not a reasonable practical period for a proposal of this scale, complexity and public interest where the public pack is extensive, yet lacking, key consultees have not reported, and the proposal itself remains unsettled. The Home Office urgency statement assumed submission in July and approval by late August 2026; those milestones had already passed when the application was validated on 2 September. The applicant should provide an up-to-date timetable and clearly explain how allowing sufficient time to properly assess the application would affect the delivery of the scheme.
- 3.10. Foul and surface-water solutions, safe pedestrian access, health and emergency-service capacity, power, waste, fire safety, contamination, ecology and the full operational model remain materially unresolved. Conditions may secure detailed implementation after the principle and feasibility of a solution are established. They should not substitute for evidence that an acceptable solution exists.

4. CORPORATE IMPLICATIONS

- **Legal and procedural:** the Secretary of State is the decision-maker. The Council's response should remain directed to material planning considerations, explain the evidential basis for each conclusion and avoid presenting administrative validation as a merits judgment.
- **Equalities and human rights:** the assessment concerns land use, infrastructure, safety, health and amenity. It does not rely on the nationality, religion, sex or immigration status of prospective occupiers, generalised fear or the number of objections. The needs and safety of service users, nearby residents and people with protected characteristics must all be considered.
- **Climate and environment:** the Climate Action Plan, Healthy Bicester and Oxfordshire Marmot Place commitments are relevant corporate context but are not substitutes for development-plan policy. Their land-use objectives are addressed through the adopted plan and current national policy.
- **Financial and service implications:** no Council expenditure is authorised by this report. Any planning obligation must meet the statutory tests. Separate inter-governmental funding may properly address wider service burdens that cannot lawfully be secured through planning.
- **Risk:** a decision on an undefined and internally inconsistent scheme creates a material risk of effects being discovered only after permission or during phased occupation. The requested information, renewed consultation and phase-specific controls are intended to manage that risk.

DETAILED PLANNING ASSESSMENT AND DRAFT CONSULTATION RESPONSE

MAIN REPORT

5. APPLICATION, SITE AND LOCALITY

- 5.1. The application relates to MOD Bicester Site A, part of the former Defence Storage and Distribution Centre / Bicester Garrison complex situated in the countryside to the south-east of Bicester, between Piddington and Upper Arncott. The site lies generally to the east of the B4011 in the vicinity of Widnell Lane and Palmer Avenue.
- 5.2. Site A is a substantial former military storage and logistics site with an established network of internal roads, hardstanding, service infrastructure and military buildings/structures. The wider site has a long-standing defence use dating from the Second World War. The Home Office material supplied to the Council states that Site A is no longer in active use by the Ministry of Defence.
- 5.3. The submitted location plan defines an irregular red-line area with a long access spur to the southern B4011 entrance. The application form and principal planning documents identify the site as approximately 10.22 hectares, although other documents refer to 9.36 hectares and 5 hectares, perhaps referring to the areas being principally used for accommodation.
- 5.4. The land is substantially previously developed, with extensive hardstanding, internal roads, Nissen huts, warehouses, perimeter fencing and utility infrastructure. Much of the accommodation area is vacant or underused, although the transport material refers to continuing activity in part of the wider depot. The lawful and operational baseline should be confirmed.
- 5.5. Two gated accesses exist from the B4011. The northern access has not been used for a considerable period and is unlit; it is proposed as the principal operational access. The existing southern access would be used for construction and emergencies and crosses the line of the disused military railway. The B4011 is subject to a 50mph limit with a history of road traffic incidents. There is no continuous safe pedestrian route from the northern access and the submitted Transport Assessment records limited walking, cycling and public-transport accessibility.
- 5.6. The parameter plan places a broad operational development zone over most of the northern and central site. The plan legend permits development up to 12 metres above existing site levels. This conflicts with written material describing two-storey modular buildings of up to about 6 metres. The 12-metre envelope must be assessed unless a revised plan narrows it.
- 5.7. The surrounding area is predominantly rural in character, although the extensive former military estate, roads, hardstanding, storage buildings, utility infrastructure and other operational/previously operational development give the immediate locality a distinct developed military character. Piddington lies to the south-east and Upper Arncott lies to the south/south-west, both within 2km walking distance, with other settlements including Ambrosden and Blackthorn in the wider area.

6. CONSTRAINTS

6.1. The following matters are known from the site history or are likely to require specific consideration:

- Previously developed former military land with extensive hardstanding, buildings and infrastructure.
- Overhead high-voltage electricity lines crossing the site; the submitted parameter plan does not clearly define an exclusion/easement corridor.
- Areas of mapped surface-water flood risk and an existing drainage network reported to be in poor condition or obstructed; small peripheral areas of fluvial Flood Zones 2 and 3.
- Potential hydrological pathway to Arncott Bridge Meadows SSSI, on which Natural England has requested further information and reconsultation.
- Trees, hedgerows, scrub and potential protected-species habitat; the application correspondence identifies further surveys for bats, badger, dormouse, breeding birds, great crested newt/amphibians, reptiles, otter and water vole.
- Military land-use legacy including potential contamination, asbestos-containing structures, ground risk and unexploded ordnance (UXO).
- Potential Roman and medieval archaeological remains. No designated heritage asset lies within the site; listed buildings at Piddington are separated from it and reported to lack intervisibility.
- Rural location with limited access to shops, healthcare, public transport and other day-to-day services by walking, wheeling or cycling.
- Existing defence, prison, electricity, railway and other infrastructure in the vicinity, requiring safe integration and emergency planning. Trees, hedgerows and existing perimeter vegetation have historically provided significant screening of the site and will require current arboricultural and landscape assessment.
- The site is close to the Bicester Military Railway and an existing level crossing/access arrangement. Highway, pedestrian, cycle, public transport and rail interface matters require detailed assessment.

7. DESCRIPTION OF PROPOSED DEVELOPMENT

7.1. The Home Office seeks full planning permission under sections 293B–293C of the Town and Country Planning Act 1990 for a phased, temporary, non-detained asylum accommodation centre for up to 1,256 single adult male service users aged 18–65. The Secretary of State accepted on 2 September 2026 that the proposal is nationally important and required urgently. MHCLG is the decision-maker, supported by the Planning Inspectorate; the Council is a statutory consultee.

7.2. The proposed use is for ten years. The development would retain and change the use of Building A6, demolish existing buildings and structures, install two-storey modular accommodation and ancillary buildings, and provide internal roads, parking, security, utilities, open space and recreation. The description and use-class entry should be clarified because the application form refers to Class C2A while the proposal is expressly non-detained and may be a sui generis use.

7.3. The written statement describes three phases:

- Phase 1 for 408 service users on the north-western hardstanding;
- Phase 2 for 216; and
- Phase 3 for 632.

It also refers to approximately 130 staff, four substations, generator compounds, water storage, 147 car spaces and only eight cycle spaces. These details are not fixed by a proposed layout submitted for approval.

7.4. The submitted schedules refer to approximately 15,950m² of demolition; 1,400m² retained/change-of-use floorspace; 14,471m² of new modular buildings; a 3,105m² wastewater treatment area; and a 359m² pumping-station area. Those figures do not reconcile with all totals stated elsewhere in the application. A corrected, single development schedule is required.

7.5. The applicant describes single- and two-storey modules and relies on a 'Rochdale Envelope'¹ to defer detailed design to conditions. The only plan said to establish the development envelope allows operational development up to 12 metres above existing levels across a broad zone. No proposed layout or building drawings are supplied. The application therefore combines the label and legal outcome of a full application with the information content of an early parameter or outline proposal.

7.6. The proposal includes kitchen/dining, laundry, welfare, reception/interview, education, multi-faith, indoor/outdoor recreation, gym and staff facilities, and space for an on-site medical centre. The evidence does not yet secure the staffing, opening hours, service specification, commissioning or funding of all facilities.

7.7. The Operational Management Plan is expressly an outline. A full plan is to follow appointment of the service provider. Important passages concerning admissions, movement, visitors, health and safety, self-harm, security and incident management are blank or withheld in the public version. Security-sensitive information may properly be protected, but non-sensitive operational commitments material to transport, healthcare, amenity and community effects still need to be defined and enforceable.

7.8. The Transport Assessment identifies 139 standard and eight accessible staff/visitor car-parking spaces, eight cycle spaces and an equivalent number of powered two-wheeler spaces. No service-user car parking is proposed. Coach/minibus and servicing areas are indicated. Staff numbers, detailed trip generation and some

¹ The Rochdale Envelope is a legal principle used in UK environmental impact assessments (EIAs) that allows developers to apply for outline planning permission or infrastructure consent with flexible project parameters, provided the maximum potential environmental impacts are fully assessed.

operational transport assumptions are redacted or blank in the material available to the Council and should be supplied confidentially if genuinely security-sensitive.

8. RELEVANT PLANNING HISTORY

- 8.1. The site has a particularly relevant planning history involving previous Home Office proposals for asylum/immigration accommodation.
- 8.2. **02/01045/GD** - In 2002 the Home Office submitted a deemed-consent proposal under the then Crown development procedures for an Accommodation Centre for up to 750 Asylum Seekers on the DSDC (MOD) Site A near Piddington. Cherwell District Council objected. A non-statutory Public Inquiry was subsequently held (Secretary of State reference APP/C3105/V/02/1097458). The Inspector recommended refusal, principally because of conflict with the development plan and the unsustainable rural location, but the Secretary of State disagreed and granted conditional outline planning permission on 18 August 2003, attaching substantial weight to national need, the previously developed nature of the land and the benefits of the proposal. The Council's legal challenge was unsuccessful.
- 8.3. Detailed proposals under **04/02503/GD** were subsequently supplied for siting, design, layout, external appearance, landscaping and lighting. In March 2005 Cherwell objected to the accommodation-block design and landscape effect, night-time lighting intrusion and driver distraction on the B4011. The Secretary of State did not determine those details and the project was seemingly abandoned. This history demonstrates that design and lighting cannot be assumed acceptable merely because the principle of an accommodation use was previously supported nationally.
- 8.4. **08/02511/F** - Full planning application by the Home Office UK Border Agency for demolition and the erection of an 800-person Immigration Removal Centre on part of Site A, including accommodation, central facilities, gatehouse, visitor centre, energy centre, parking, access, security fencing, hardstanding and landscaping. The 2008 committee report recorded a 14 hectare application site and recommended approval subject to departure procedures, legal agreement/transport mitigation, resolution of Environment Agency and other technical matters, and conditions.
- 8.5. The 2008 proposal is materially different from the current scheme because it was a secure immigration removal centre with detainees, whereas the present proposal is understood to be open asylum accommodation with residents able to leave the site. Nevertheless, the previous decisions remain material to the extent that they address the principle of substantial Home Office development on Site A, the previously developed character of the land, landscape containment, transport sustainability, infrastructure and ecological constraints.

Comparisons with HMP Bullingdon

- 8.6. HMP Bullingdon, about 300 metres to the south-west, is a relevant physical and cumulative reference. Full planning permission 21/04216/F was issued on 22 September 2022 for a new 240/247-bed, four-storey accommodation houseblock

and ancillary buildings, extensions, parking and landscaping. The officer report records about 9,704m² of new floorspace and acknowledges that parts of the four-storey roof would be visible, but concluded that the established prison, tall perimeter wall, existing three- and four-storey buildings, internal siting and mature planting limited the effect.

- 8.7. That permission shows that taller development can, in appropriate circumstances, be accommodated in this broader developed landscape. It does not establish that 12-metre development anywhere within Site A is acceptable. The prison proposal had a fixed layout, building-specific floor plans and elevations, a long approved-drawing schedule, ordinary publicity and consultation, committee scrutiny, a S106 contribution of £125,000 towards public transport, and conditions tied to identified plans. It was inside an existing secure prison whose occupants' external movement is not comparable.
- 8.8. The HMP report also recorded limited pedestrian access, surface-water accumulation, water-network constraints and the need for sustainable transport and infrastructure measures. Current variations and discharge applications confirm ongoing implementation. The cumulative construction and operational effects of the prison expansion must be included in the present transport, drainage, utilities, landscape and emergency-service assessments rather than dismissed solely because the prison population is detained.

9. PRE-APPLICATION DISCUSSIONS

- 9.1. No formal pre-application planning submission had been made to Cherwell District Council. The Council became aware of the Government's intention to explore use of Site A for asylum accommodation in June 2026 and has since been collating information in anticipation of the formal Crown consultation.
- 9.2. A meeting at the beginning of August with the Crown Casework Team and members of CDC was only to confirm the processes involved and broad approach of administration; no details, timescales or principle planning matters were discussed.

10. PROCEDURAL POSITION, URGENCY AND CONSULTATION

- 10.1. The Secretary of State validated the application on 2 September 2026 and invited representations between 7 and 17 September 2026. The Secretary of State had previously concluded that the development was nationally important and genuinely urgent and, on 26 August 2026, had directed that it was not EIA development.
- 10.2. The Urgent Crown Development procedure changes the decision-maker and deliberately accelerates consultation. It does not remove the statutory and policy need to consider all relevant planning matters. Government guidance requires any plans, drawings or information necessary to describe the development and sufficient information to make an informed planning judgment. It also provides for the Crown

Casework Team to request further information and for an independent adviser with security clearance where material information cannot be disclosed publicly.

- 10.3. In principle, the Home Office's urgency case is entitled to substantial weight. It identifies continued demand for asylum accommodation, the objective of reducing hotel use, operational resilience and the consequences of delaying this additional facility. However, the stated programme assumed submission in July, permission by late August and works thereafter to allow bedspaces in 2026. Validation did not occur until 2 September. The report does not provide a revised timeline, phase-opening dates or evidence of what additional delay would result from a short but adequate further consultation after the missing information is supplied.
- 10.4. There is therefore a need to understand why the current ten-day public period is necessary and proportionate. The issue is not that every urgent application must reproduce ordinary timescales. It is that this period includes only eight working days, covers a large and technically complex pack, despite being incomplete, and expires before many specialist responses can reasonably be obtained, reviewed and debated. Consultation is less meaningful where the proposal itself is not capable of being understood spatially and comprehensively.
- 10.5. Current NPPF policy DM1 expects major proposals to be informed by proportionate early engagement with the community, local planning authority, consultees and infrastructure providers. The Council and the Leader's correspondence record that no meaningful local engagement took place before the public announcement. The applicant refers to an operational working group, stakeholder engagement and future forums, but does not explain what planning changes resulted from pre-application engagement. The absence of early resolution has transferred an unreasonable burden to the compressed statutory period.
- 10.6. It is considered that the Secretary of State should not determine the application until the Council and others have had a reasonable opportunity to comment on a complete and reconciled proposal. Any materially amended plan, drainage solution, access design, operational model or environmental assessment should be published and consulted upon for a new period proportionate to its significance.

11. INFORMATION ADEQUACY AND VALIDATION

- 11.1. Validation is an administrative endeavour; it is not an assessment or conclusion that the proposal complies with policy, that its effects are acceptable, or even that every detail required for determination is present. The Secretary of State's acceptance of the application must be respected, but it does not prevent the Council identifying deficiencies or requesting further information under the published guidance.
- 11.2. Notwithstanding the redactions, if this application had been submitted to Cherwell District Council as a full planning application for non-residential development on a site over one hectare, it would not meet the Council's current validation checklist and would have been returned as invalid. The national-list section of that checklist requires existing and proposed site/block plans, existing and proposed elevations and existing and proposed floor plans. The local list also identifies, subject to

relevance, landscape, lighting, parking/servicing, surface-water drainage, transport, tree, ecology, contamination and flood information. Here, essential proposed drawings are absent and several technical documents state that key surveys, modelling and design will be done later.

- 11.3. The tests of the Urgent Crown Development procedure are expressed differently but has the same intention: the application must include what is necessary to describe the development and allow an informed planning judgment. A broad land-use label, maximum population and 12-metre zone do not sufficiently define a development of 17,935 square metres with sleeping accommodation, hazardous former land uses, new wastewater infrastructure, extensive servicing and potentially sensitive security measures.

12. RESPONSE TO PUBLICITY

- 12.1. This is not a planning application for determination by Cherwell District Council. Under the Urgent Crown Development procedure, the application is made directly to and determined by the Secretary of State. MHCLG is responsible for the statutory consultation/representation process and may ask the Council to assist with local publicity, including the display of site notices.
- 12.2. This report and the committee's consideration of it are therefore intended to inform and authorise the Council's formal representation to MHCLG. Public representations on the Crown application should be made through the process specified by MHCLG.
- 12.3. Internal departments have been consulted and any responses received have been summarised in the table below. Matters concerning the merits of national asylum / immigration policy as such are not, by themselves, land-use planning considerations; however, the land-use consequences of the proposed accommodation, including safety, amenity, transport, infrastructure and community impacts, are material where supported by planning evidence.

Topic	Published position	Why is this important?
Proposed layout	None published; only a broad development zone.	Cannot locate phases, buildings, roads, open space, access, parking, plant, drainage, trees or buffers.
Plans / elevations / sections	No proposed floor plans, elevations, roof plans, sections or finished levels.	Cannot assess mass, appearance, living conditions, fire separation, accessibility, levels or visibility.
Height envelope	Parameter plan: up to 12m; EIA and landscape case: no more than 6m.	Permission and assessment do not address the same worst case.
Floorspace	17,350m ² appears on the form; 17,935m ² in the statement.	Scope of permission, impacts and fee basis need a single schedule.

Topic	Published position	Why is this important?
Phasing	Occupancy numbers described, spatial sequence not fixed by an approval plan.	Cannot confirm infrastructure and safeguards precede each phase.
Operational model	High-level plan; provider not appointed; significant public omissions/redactions.	Travel, visitor, welfare, health, complaints, safeguarding and community effects depend on operation.
Transport / access	No agreed pedestrian scheme; access roles and speed limit conflict; shuttle details incomplete.	Safety and sustainable movement cannot be judged or secured.
Foul water	Interim tankering; public-sewer capacity unconfirmed; on-site works not designed / permitted.	A feasible, phase-specific disposal route is fundamental.
Surface water	CCTV, modelling, infiltration and detailed design outstanding; published assumptions conflict.	Flood safety, greenfield rates, SSSI protection and maintenance unproven.
Power / energy	Existing capacity / configuration unknown; generators anticipated; feasibility deferred; high power line running through site	Noise, air quality, carbon, resilience and delivery remain unclear, impacts upon resident heath.
Waste	Only general / recyclable separation stated; no quantities, compounds, collections or specialist streams.	Servicing, odour, pests, amenity, public health and circular-resource effects cannot be assessed.
Ecology / trees	Multiple species surveys and arboricultural impact assessment deferred.	Layout could prejudice avoidance and mitigation; BNG position unclear.
Contamination / UXO	Preliminary assessments recommend targeted intrusive work and further risk assessment.	Suitability of sleeping accommodation and construction method not fully demonstrated.
Fire / emergency	Strategy without fixed layout, building specifications or access/hydrant plan.	Fire spread, evacuation capacity and emergency access cannot be verified.

Topic	Published position	Why is this important?
Landscape / lighting / security	No detailed building, lighting, fencing, CCTV, plant or landscape plans.	The qualified landscape conclusion cannot be applied to the full envelope.

- 12.4. A parameter-led approval is not objectionable in principle. The flaw is that the parameters must be precise enough to constitute a coherent maximum scheme and every assessment must test the same envelope. Conditions can then control detail within it. Here, the applicant's own Urban Design response describes the proposal as outline in nature, while the application seeks full permission and no subsequent reserved-matters process is identified. Discharge of conditions is not a substitute for public scrutiny of the development's basic form.
- 12.5. Redaction does not explain the absence of ordinary proposed plans. A general layout showing development parcels, routes, buffers, drainage areas, open space and heights can ordinarily be prepared without publishing sensitive security specifications. If any omitted spatial information is genuinely sensitive and material, the Council asks the Secretary of State to confirm that the unredacted information has been assessed, to appoint an appropriately cleared independent adviser, and to publish a non-sensitive summary of the conclusions and controls.

13. RESPONSE TO CONSULTATION

- 13.1. The following consultees responded to CDC Planning to inform this Committee Report and give a more comprehensive review of the proposals being considered.

CDC Landscape

- 13.2. No objection in principle, subject to the assessed height and development parameters, retention of screening vegetation and a detailed mitigation and management condition. Assessment is qualitative and limited by absence of layout.

CDC Urban Design

- 13.3. Satisfied that contextual and functional requirements have been considered 'at this outline stage'; notes general principles only.

CDC Waste Management

- 13.4. Cherwell's commercial waste service can provide both general waste and recycling collections for the site if required. However, no details have been provided regarding waste storage capacity, collection arrangements, or how recyclable materials will be segregated and managed on site.

CDC Ecology

- 13.5. The Preliminary Ecological Appraisal and its initial conclusions are considered appropriate at this stage. However, the ecological records search appears incomplete, with omitted records including badger within 500m, great crested newts within 200m, priority plant species and several notable butterfly species within 1km, including records from the site itself. Further surveys are required for hazel dormouse, barn owl, breeding birds, great crested newts, reptiles and terrestrial invertebrates. District-level licensing may provide an alternative approach for great crested newts, while pre-construction checks are likely to be sufficient for badger and water vole. An updated habitat and botanical survey should also be undertaken at an appropriate time of year. The results must inform the design and ensure that impacts are avoided or mitigated in accordance with the mitigation hierarchy.
- 13.6. The site access lies within a Local Nature Recovery Strategy recovery zone, while the wider site adjoins both that zone and the Ray Conservation Target Area. Landscaping should respond to the objectives of these areas, with wide hedgerow buffers and planting designed to support butterflies and other invertebrates. A lighting strategy should follow BCT/ILP Guidance Note 08/23, and the effects of intensive recreation on retained habitats must be considered. Natural England is satisfied that a final drainage strategy could avoid hydrological effects on Arncott Bridge Meadows SSSI, although ecological monitoring and provision for remedial action are also recommended.

CDC Environmental Protection

- 13.7. Environmental Protection raises no objection to the methodology or findings of the submitted Noise Assessment or Air Quality Assessment. However, a Stage 2 noise assessment and acoustic design statement would be required to inform the detailed layout, with accommodation positioned within lower-risk areas away from the road wherever practicable and any necessary mitigation installed and maintained. A Demolition and Construction Environmental Management Plan should also be secured to control noise, dust and other construction effects and to establish arrangements for consultation and communication with nearby occupiers.
- 13.8. A full assessment of land contamination cannot be made because the submitted report is redacted. Given the site's former military use, a staged investigation, remediation and verification process should therefore be secured, including specific assessment of potential PFAS contamination. Details of all external lighting should also be submitted for approval to prevent unacceptable light spill or disturbance to sensitive premises. No concerns are raised in relation to odour.

Piddington Parish Council

- 13.9. Piddington Parish Council has formally resolved to object and requests that Cherwell District Council and Oxfordshire County Council maintain a formal objection to the Secretary of State. The Parish Council stresses that Piddington is directly affected by the location and scale of the proposal and that Cherwell's role carries particular importance under the Urgent Crown Development procedure. The application will

be determined directly by the Secretary of State without an Inspector, hearing or inquiry. Cherwell's response will therefore be one of the principal sources of independent local planning evidence available to the decision-maker. The Parish Council also notes that no engagement took place with the District Council before the proposal was publicly announced.

- 13.10. The Parish Council disputes the applicant's assertion that there is no statutory requirement to consider compliance with the development plan. It refers to Planning Practice Guidance, which states that Crown Development applications should be determined in accordance with the development plan unless material considerations indicate otherwise. It considers that the submitted Planning Proposal Statement lists relevant policies without properly applying them to the development. Specific concerns include the omission of Policy Villages 1, given that the site lies outside and does not adjoin a settlement in the hierarchy; the effect of service vehicles, coaches, minibuses and foul-effluent tankers on unsuitable rural roads under saved Policies TR7 and TR10; and the lack of assessment of the perceived separation between Piddington, Upper Arncott and Ambrosden under saved Policy C15. Further concerns relate to water efficiency, the absence of BREEAM and energy evidence, the deferral of renewable-energy and combined heat and power assessments, the absence of LLFA approval for drainage, uncertainty over water resources, outstanding ecological surveys and the failure to demonstrate infrastructure capacity.
- 13.11. The Parish Council accepts that the previously developed nature of the site and the 2003 planning history are material considerations. However, it states that the applicant relies upon the 2003 decision without addressing the preceding Inspector's recommendation for refusal. That permission related to accommodation for 750 people, rather than the 1,256 now proposed, and was never implemented. The Parish Council also notes that Cherwell objected to the subsequent reserved matters on design, lighting and highway-safety grounds before the project was cancelled.
- 13.12. A central concern is the absence of confirmed infrastructure capacity. The Parish Council states that Bicester Sewage Treatment Works was designed to accommodate planned growth only up to 2026 and that available headroom has not been established. The applicant instead proposes an on-site wastewater treatment works discharging to a watercourse, although no environmental permit application has been made. The condition and capacity of the electrical network are also unknown, with the submitted assessment assuming that the existing infrastructure cannot be relied upon and that generators may be required. No substantive capacity or resourcing confirmation is identified from Thames Water, the Integrated Care Board, the emergency services or waste providers. Site A is not allocated or identified as an anticipated growth location in the Council's Infrastructure Delivery Plan and has therefore not been tested through the local plan process for development of this scale.
- 13.13. The Parish Council also objects to the extent to which essential matters are deferred to conditions. These include lighting, foul and surface-water drainage, long-term power provision, contamination, ecology, arboriculture, archaeology, fire safety, construction traffic, operational management and the effects of the proposed wastewater treatment works. It considers that these matters concern whether

acceptable and deliverable solutions exist, rather than matters of detail which can safely be resolved after permission is granted. Particular concern is raised that the urgent procedure provides no Inspector, hearing or inquiry through which the subsequent discharge of conditions would receive independent scrutiny. The Parish Council therefore asks Cherwell to undertake a policy-by-policy assessment, require confirmation of infrastructure capacity, object independently to the principle of development at this location and request that information fundamental to the acceptability of the scheme is provided before determination.

13.14. PPC also sent objections to Oxfordshire County Council requesting highway and LLFA objection pending pedestrian, access, trip, routing, drainage, survey, modelling and management information

13.15. PPC also sent a comprehensive formal objection direct to MHCLG / Parliament.

Thames Valley Police - Designing Out Crime (draft response only)

13.16. Raises concerns from a crime prevention, security and community safety perspective. The site is highly rural and isolated, with no suitable pedestrian or cycle connections and very limited public transport. Residents would therefore depend heavily on organised shuttle services. Access is from the unlit B4011, a 50mph rural road on which nine collisions, including one fatal and three serious collisions, were recorded during the five-year period cited. The principal entrance may also become a focus for protest activity, creating potential conflict with construction traffic, staff and other site users. The scale of the proposed accommodation, for up to 1,250 adult males, would be substantial when compared with Piddington, Arncott and Ambrosden, where services and leisure facilities are limited. This raises concerns about the suitability of the location for long-term occupation, social isolation and the concentration of activity within a small number of places.

13.17. The proximity of the accommodation to the site boundary and its visibility from the B4011 could also reduce residents' privacy and increase the risk of observation, filming, harassment, hostile attention or protest. Recommended measures include enhanced perimeter security, increased stand-off distances, landscape screening, physical barriers, defensive design measures and CCTV monitoring. Although shuttle buses would be essential, the concentrated arrival of groups in Bicester, Aylesbury or other centres could create safeguarding, confrontation and community-cohesion concerns. Careful consideration should therefore be given to service frequency and occupancy, staggered travel, destination management and community engagement. Appropriate mitigation would be required to address the identified privacy, security and community safety risks. The comments relate solely to crime prevention design.

Leader of the Council's letters

13.18. The Leader, Councillor Lesley McLean, wrote to the Home Secretary on 30 June 2026 (referred to in the later correspondence as the letter of 1 July) and again on 29 July. The first letter records that the Council was not consulted before announcement and seeks information on timing, infrastructure, management, movement, catering and activities, healthcare and worship, security and visitors,

policing, community impacts, planning route, funding, engagement, cohesion, processing and onward movement.

- 13.19. The planning assessment independently supports many of the letters' land-use concerns: a facility of this scale requires evidence of healthcare, transport, policing/emergency-service and community infrastructure from first occupation; its operating model must be enforceable; and local people require a meaningful opportunity to understand and comment on the scheme. The report does not adopt partisan or non-planning objections concerning asylum policy itself.

14. RELEVANT PLANNING POLICY AND GUIDANCE

- 14.1. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 14.2. Although Cherwell District Council is not the determining authority, the Council's response should apply the same plan-led approach to the planning merits. The Secretary of State should take account of all relevant material planning matters when determining an Urgent Crown Development application. The adopted development plan remains the Council's local planning framework and is a material basis for its consultation response. The applicant's statement that there is no statutory requirement to consider development-plan compliance should not be read as permission to assess the proposal disregarding the Development Plan. Even if the urgent statutory route modifies the ordinary decision framework, Government guidance requires all relevant planning matters to be explored, and the Development Plan is the principal expression of locally tested land-use policy.
- 14.3. The Cherwell Local Plan 2011-2031 - Part 1 was formally adopted by Cherwell District Council on 20th July 2015 and provides the strategic planning policy framework for the District to 2031. The Local Plan 2011-2031 – Part 1 replaced a number of the 'saved' policies of the adopted Cherwell Local Plan 1996 though many of its policies are retained and remain part of the development plan. The relevant planning policies of Cherwell District's statutory Development Plan are set out below:

CHERWELL LOCAL PLAN 2011-2031 PART 1 (CLP 2015)

- PSD1 - Presumption in Favour of Sustainable Development
- SLE4 - Improved Transport and Connections
- BSC8 - Securing Health and Well-Being
- BSC9 - Public Services and Utilities
- ESD1 - Mitigating and Adapting to Climate Change
- ESD 2: Energy Hierarchy and Allowable Solutions
- ESD 3: Sustainable Construction
- ESD 4: Decentralised Energy Systems
- ESD 5: Renewable Energy
- ESD6 - Sustainable Flood Risk Management
- ESD7 - Sustainable Drainage Systems (SuDS)

- ESD10 - Protection and Enhancement of Biodiversity and the Natural Environment
- Policy ESD 11: Conservation Target Areas
- ESD13 - Local Landscape Protection and Enhancement
- ESD15 - The Character of the Built and Historic Environment
- ESD17 - Green Infrastructure
- INF1 – Infrastructure

CHERWELL LOCAL PLAN 1996 SAVED POLICIES (CLP 1996)

- TR1 - Transportation funding
- TR7 - Development attracting traffic on minor roads
- C5 - Protection of ecological value and rural character of specified features of value in the District
- C8 - Sporadic development in the open countryside
- C28 - Layout, design and external appearance of new development
- ENV1 - Development likely to cause detrimental levels of pollution
- ENV12 - Development on contaminated land

- 14.4. The Cherwell Local Plan Review 2042 was submitted for examination on 31 July 2025 and remains an emerging plan. Its relevant spatial, transport, healthy-community, climate, design, infrastructure and environmental policies may be given weight in accordance with NPPF policy DM4, having regard to their stage, unresolved objections and consistency with national policy. It does not displace the adopted plan at this stage.

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- 14.5. The current National Planning Policy Framework is the August 2026 edition, not the earlier edition relied upon in the July Planning Proposal Statement. Particularly relevant are:
- DM1–DM3 (engagement, information and decisions);
 - S3 and S5 (sustainable development and development outside settlements);
 - DP3 and DP4 (well-designed places and design process);
 - TR6 (transport evidence and impacts);
 - HC3 and HC4 (community/public-service infrastructure and health);
 - P2–P5 (ground conditions, pollution, existing activities, safety and security);
 - F4–F8 (flood risk and SuDS); and the natural and historic environment policies.
- 14.6. NPPF policy HC3 is directly engaged because the proposal would bring significant numbers of additional people to the area. It requires an understanding of associated community facilities and public-service infrastructure and provision of what is necessary, available by first occupation. Policy HC4 supports demonstrable health benefits and proactive collaboration. Policy DM3 expressly recognises insufficient information and public-safety risk as reasons why a decision may need to await advice.

14.7. OTHER MATERIAL PLANNING CONSIDERATIONS

- National Planning Policy Framework (December 2024, as amended February 2025)
- Planning Practice Guidance, including Crown Development and Urgent Crown Development guidance
- Town and Country Planning Act 1990, sections 293B-293C (Urgent Crown Development)
- Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025
- Cherwell Residential Design Guide SPD (2018), where relevant to general design principles
- Oxfordshire Local Transport and Connectivity Plan and current parking/street design guidance
- Conservation of Habitats and Species Regulations 2017
- Natural Environment and Rural Communities Act 2006
- Environment Act 2021 / biodiversity net gain requirements, subject to application-specific applicability
- Human Rights Act 1998
- Equality Act 2010, including the Public Sector Equality Duty
- Planning Practice Guidance on urgent Crown development;
- Cherwell's March 2024 Local Validation Requirements, reviewed in March 2026;
- the Cherwell Landscape Character Assessment 2024;
- the Oxfordshire Wildlife and Landscape Study;
- Healthy Bicester;
- Oxfordshire Marmot Place; and
- the Council's Climate Action Plan 2026–2027

14.8. CORPORATE HEALTH, CLIMATE AND PLACE-SHAPING CONTEXT

- 14.9. Cherwell declared a climate emergency in 2019, committed its own operations to net zero by 2030 and supports a carbon net-zero district. The Climate Action Plan 2026–2027 states that sustainability should be embedded across services and strategic decision-making. Its district goals include planning for biodiversity and climate resilience, reducing transport emissions, reducing waste and resource use, supporting low-carbon energy, climate adaptation, nature recovery and collaboration.
- 14.10. Healthy Bicester grew from Bicester's designation as an NHS Healthy New Town in 2016 and continues as a district-wide healthy place-shaping programme. It links the built environment, community activation and new models of care, including active travel, access to green space, social connection and health infrastructure. Oxfordshire became a Marmot Place in 2024, committing local bodies to address the social determinants of health and unequal access to healthy living conditions and services, including rural inequality.

14.11. These corporate programmes are not development-plan policies and do not create freestanding reasons for refusal. They do, however, illuminate the practical application of adopted Local Plan BSC, ESD and INF policies and NPPF DP3, HC3 and HC4. A scheme housing a potentially vulnerable population in a poorly connected rural location should demonstrate, rather than assume, healthy accommodation, safe movement, access to nature and activity, primary and mental-health care, social connection and no disproportionate transfer of impacts to nearby communities.

15. APPRAISAL

15.1. The key issues for consideration in this case are:

- Procedural context and the scope of the Council's response
- Principle of development, national need and the planning history of Site A
- Location, accessibility and sustainability
- Design, scale, layout, landscape and visual impact
- Highway safety, traffic, parking and sustainable transport
- Community impact, residential amenity, public safety and security
- Health, emergency services, utilities and other infrastructure
- Ecology, biodiversity net gain, trees and green infrastructure
- Flood risk, drainage and water environment
- Contamination, ground conditions and unexploded ordnance
- Human rights and equalities
- Planning balance and recommended response

Principle of development, national need and planning history

15.2. The site is previously developed former military land and has twice been the subject of substantial Home Office accommodation proposals. The 2003 Secretary of State decision is particularly relevant because national need and the reuse of previously developed Site A were afforded substantial weight despite acknowledged concerns about the rural location and sustainability. The current proposal must nevertheless be assessed on its own facts and under the current development plan and NPPF.

15.3. The Home Office considers that the proposal meets several of the criteria for nationally important development identified in the Written Ministerial Statement of 13 February 2025. It states that accommodating eligible destitute asylum seekers is a national public service arising from the Secretary of State's statutory responsibilities under the Immigration and Asylum Act 1999. The asylum accommodation estate is said to remain under sustained pressure because of historically high and fluctuating levels of demand, limited dispersal accommodation and continued reliance on hotels. The Home Office argues that any significant shortfall in capacity could affect human welfare, place additional pressure on public services and, during periods of increased arrivals, potentially amount to a civil emergency.

- 15.4. The Statement further argues that these pressures cannot be managed effectively at a local level and require a coordinated, flexible national accommodation estate. The Bicester site would provide up to 1,256 bedspaces as a controlled and self-contained element of that estate, with the ability to respond to changing demand and provide surge capacity. Its former military use, existing hardstanding, defined boundaries, gated access, modular construction and proposed on-site services are cited as supporting rapid and secure delivery while reducing reliance on hotels and the associated operational, safeguarding, community cohesion and public-order risks. On this basis, the Home Office considers that the proposal would contribute to a national public service, support the response to national pressures and have a strong public interest at a national level.
- 15.5. A key distinction from the 2008 IRC proposal is that the present use would be open asylum accommodation rather than detention. Residents would be able to leave the site. This increases the relevance of accessibility to services, walking/cycling conditions, public transport, managed transport, community interaction and the infrastructure capacity of nearby settlements.
- 15.6. The proposal would reuse previously developed Crown land in an established military / prison context. Reuse of hardstanding and a temporary modular approach could limit land take and construction impacts. National need and the public service performed by the Home Office are substantial material benefits. The 2003 and 2010 permissions show that accommodation uses have previously been accepted in principle when supported by defined proposals and mitigation.
- 15.7. Against that, Site A lies outside a settlement in a rural location not allocated for this use. The nearest villages have limited facilities, pedestrian connections are poor, and the present non-detained use would generate a different relationship with surrounding communities from the earlier secure proposals. The applicant's assertion that self-containment means the location is not a material constraint.
- 15.8. The development would be operational for ten years, but the national-importance statement describes later expansion as a long-term accommodation solution and the EIA screening assumes at least ten years with potential extension, treating permanent operation as a worst case. Ten years is a substantial period in the life of the affected communities. Temporary permission reduces permanence but does not reduce the need for safe access, infrastructure and acceptable living conditions throughout that period.
- 15.9. The Council cannot reach a positive conclusion on principle until it understands the physical design parameters of scheme, the number and turnover of residents in each phase, the operating model, layout level, and whether necessary infrastructure will exist before occupation. On present evidence, national benefits do not overcome the policy conflict and unresolved site-specific effects.

Community, Health, Wellbeing, Safety And Equalities

Piddington, Upper Arncott and Cumulative Daily Activity

- 15.10. The proposed maximum population of 1,256 is substantial relative to the nearby rural settlements. Piddington and Upper Arncliffe are foreseeable destinations because they are the nearest communities and lie within practical walking range, even if Bicester or Aylesbury are intended to be served by shuttle. The planning assessment must address ordinary, repeated behaviour rather than an unrealistic single mass movement.
- 15.11. The likely pattern includes individuals and small groups leaving and returning throughout the day and evening, attending shops, places of worship, recreation, services or transport, or simply walking. Effects may be individually modest but cumulative: pedestrian exposure on unlit roads; use of village verges, paths and public spaces; litter and waste; pressure on limited shops, community facilities and transport; noise or disturbance; informal interactions; policing and community-safety demands; and residents' perception of safety and cohesion. These effects must be assessed objectively and without stereotyping future occupiers.
- 15.12. The application provides no quantified pedestrian-distribution assessment, desire-line plan, time-of-day profile, sensitivity testing for shuttle failure/capacity, or community-facilities audit for Piddington and Upper Arncliffe. A sign-in / sign-out system records movement but does not prevent it, remove highway risk or demonstrate where people will go. Advice, high-visibility vests and encouragement to use a shuttle are not a safe pedestrian network and are considered to be a meaningless exercise that will not deviate natural behaviour and curiosity.
- 15.13. A Community Impact and Cohesion Plan should be agreed before determination or, at minimum, before any occupation pursuant to a demonstrably feasible scheme. It should be based on engagement with parish councils, Hillside Park residents, local organisations and service providers; identify likely patterns and sensitive locations; define a staffed liaison and complaints service; establish behavioural/orientation support for all parties; manage protest and misinformation risks; fund necessary mitigation; and contain transparent monitoring, publication and review triggers.

Health and Public-Service Infrastructure

- 15.14. The submitted case refers to space for on-site healthcare and states that nearby practices are under capacity. It does not provide a commitment from the Integrated Care Board, named provider or GP / dental service; staffing levels and hours; mental-health, trauma, suicide/self-harm, pharmacy, infectious-disease and dental arrangements; patient transport; emergency pathways; or the effect on ambulance, community hospital and acute services. Space is not the same as a commissioned service.
- 15.15. The EIA screening recognises that service users may have a disproportionate prevalence of physical and mental-health needs and that emergency services may experience additional demand. NPPF HC3 requires necessary services to be available by first occupation. The Healthy Bicester and Marmot Place context reinforces the need to address rural access, inequalities, activity, isolation, healthy food and social connection for service users while ensuring existing residents are not displaced from care.

- 15.16. Before permission, the Home Office should secure written positions from the relevant health commissioners and providers, UKHSA, ambulance service, fire and rescue service and Thames Valley Police. The evidence should state the service specification, funding, recruitment, escalation and contingency arrangements for every phase. General assurances that the site will be self-contained or that other regulatory regimes apply cannot replace this land-use capacity assessment.

Safety, Security and Equality

- 15.17. Security is a material design and operational matter insofar as it affects site users, neighbours, public space, traffic, lighting, protest management and emergency services. Fear of crime without evidence is not a reason for objection. Equally, the possibility of protest, disorder and harm to service users and residents is identified in the Government's own screening statement and requires a proportionate, coordinated response.
- 15.18. The Equalities Impact Assessment is relevant but cannot be tested against an absent layout and incomplete operating plan. Detailed design must provide accessible accommodation and routes, privacy, daylight, ventilation, safe recreation, quiet and faith space, dignity, safeguarding and reasonable adjustments. The Council expects the Secretary of State to discharge the Public Sector Equality Duty on current, site-specific evidence and to explain how impacts on all protected groups have been considered.

Access, Movement and Transport

- 15.19. The site is car-dependent and lacks a safe direct walking/cycling connection. The northern access has no footway or lighting; the southern route is described as having narrow and incomplete pedestrian provision. The documents conflict on the speed limit. People living at a non-detained site will be free to walk, and their foreseeable choice to do so must be designed for, not treated as a breach of an operational aspiration.
- 15.20. The transport evidence is based in part on experience at another accommodation site and does not quantify service-user pedestrian trips or destinations. It does not fully assess evening and weekend activity, small-group movements, shuttle queuing and failure, visitor and taxi trips, construction overlap between phases, wastewater tankers, waste vehicles, generator fuel, emergency access or cumulative development at HMP Bullingdon. The EIA screening itself records 192 daily service-vehicle movements and an unknown number of shuttle trips.
- 15.21. The access strategy is not consistent; documents refer variously to the northern access as operational and the southern access as construction / emergency, while local representations understand a different arrangement. Swept-path material does not demonstrate every relevant B4011 / Widnell Lane movement or the routing of foul-water tankers and modular HGVs. The relationship with the 2010 routing agreement associated with 08/02511/F should be clarified.

- 15.22. Until OCC provides a substantive response on the final layout and operating assumptions, the Council cannot conclude that access is safe or that residual cumulative network impacts are acceptable.
- 15.23. Required evidence comprises: an agreed access and movement plan; Road Safety Audit where appropriate; continuous safe pedestrian and cycle connections or a clearly evidenced alternative; speed-limit and crossing assessment; quantified multi-modal trip generation for construction and operation; routing plans; delivery and service booking; phase overlap and HMP cumulative analysis; shuttle destinations, capacity, frequency, hours, accessibility, funding and backup; staff travel; taxi and visitor arrangements; monitoring targets; remedial triggers; and enforceable delivery before first occupation.

Design, Living Conditions, Landscape, Lighting and Heritage

Full Application / Outline Information Mismatch

- 15.24. Good design cannot be established from generic intentions alone. There is no plan showing how 600 accommodation modules and numerous welfare, kitchen, ablution, healthcare, staff and plant modules are arranged. The statement suggests only one metre between single-storey units and two metres between double-stacked units to obtain side-window daylight. Without plans, orientation, window positions, privacy, outlook, ventilation, overshadowing, fire separation, crowding, defensible space and accessible routes cannot be assessed.
- 15.25. The Urban Design Officer's conclusion is expressly confined to an outline stage. It supports the broad principles of contextual response and self-containment but cannot be treated as endorsement of a full scheme that has no layout or elevations. The Secretary of State should require a design code and fixed plans at decision stage, not leave the complete place to post-permission approval without reserved-matters consultation.

Height and Landscape

- 15.26. The most serious design and landscape inconsistency is the height envelope. The Parameters Plan permits operational development up to 12 metres. The EIA screening was expressly undertaken on a maximum two-storey or 6-metre modular scheme. The Planning Proposal Statement's landscape conclusion also says the modules would be no greater than 6 metres. A 12-metre building has a materially different bulk, skyline, lighting, plant and visibility effect from a 6-metre module, especially if sited near the edge of the broad zone.
- 15.27. The Council's Landscape Officer finds no objection in principle because the site is developed and vegetated, but states that the conclusion relies on the buildings remaining within the assessed height and development parameters and retaining principal vegetation. That advice can support a scheme capped at, located within and mitigated to the envelope actually assessed. It cannot alleviate a plan that doubles the assessed height. The plan should be amended to a 6-metre maximum

for accommodation and building-specific justified limits for exceptional plant, or a new landscape/visual assessment and EIA review should test the full 12-metre worst case.

- 15.28. A detailed landscape and arboricultural scheme must identify retained trees and hedges, root-protection areas, removals, construction protection, new native and climate-resilient planting, exposed edges, management and replacement. It must be coordinated with security sightlines, fencing, lighting, utilities, drainage, access and easements. Vegetation relied upon for screening should be retained for the permission period and during restoration.

Lighting, Security Infrastructure and Amenity

- 15.29. No lighting assessment tied to a layout has been supplied. 24-hour operation, pedestrian routes, parking, compounds, CCTV, perimeter security and emergency access are likely to require substantial lighting. The 2005 objection demonstrates local sensitivity to night-time intrusion and driver distraction. A scheme must show column/building positions, heights, luminaires, colour temperature, hours, controls and horizontal/vertical lux contours at ecological, residential, highway and landscape receptors, with a dark-sky curfew and emergency override where safe.
- 15.30. Fencing, gates, cameras, anti-climb measures, generator compounds, substations, water tanks, wastewater plant, rooftop equipment, signage and temporary structures form part of the development's appearance. They cannot be assessed as invisible ancillary detail. Sensitive security specifications may be withheld, but their physical scale, siting and environmental effects require open or independently reviewed evidence.

Heritage and Archaeology

- 15.31. The site has no designated asset, but listed buildings in Piddington and known archaeological potential lie nearby. The desk-based assessment finds moderate-to-high potential for unrecorded remains and recommends monitoring where hardstanding is disturbed. Without a fixed layout and foundation and drainage design, the extent of disturbance is unknown. The County Archaeologist's position and a proportionate written scheme of investigation should be obtained before ground disturbance is authorised.

Climate, Energy, Waste, Water, Flooding, Ecology and Land Quality

Climate and Energy

- 15.32. The proposal's temporary modular character could reduce construction time and enable components to be reused. No quantified whole-life carbon, operational-energy or overheating assessment has been supplied. The Planning Proposal Statement says low-carbon technologies and CHP / district-heating feasibility will be considered later. For 17,935m² of floorspace operating continuously for ten years, feasibility should inform the current proposals.

- 15.33. The existing electrical network's condition and capacity are described as unknown, and the proposal assumes it cannot be relied upon. Generator compounds are anticipated. Their number, fuel, duty cycle, emissions, noise, storage, refuelling traffic, resilience and transition to grid and renewable power are not fixed. The relationship with overhead high-voltage infrastructure and required safety clearances should be shown. An Energy and Sustainability Statement should apply the energy hierarchy, quantify regulated and unregulated demand and carbon, assess passive design, heat pumps, solar PV/storage, grid connection, backup generation, water efficiency and decommissioning/reuse.
- 15.34. Cherwell's climate commitments do not add an independent legal standard, but they reinforce adopted ESD1–ESD5 and NPPF DP3. A 'temporary' label is not a reason to lock in high-carbon generators or omit climate adaptation, particularly where the 'temporary' could mean ten years if not longer term.

Waste and Resource Management

- 15.35. The entire operational-waste case in the Planning Proposal Statement is that recycling will not occur on site and waste will be separated into general and recyclable streams. There are no quantities or collection frequencies for a population of 1,256 plus staff; no layout or capacity for compounds; no treatment of food, clinical, sanitary, pharmaceutical, bulky, hazardous, electrical or confidential waste; no kitchen-grease or pest controls; and no provider or highway evidence. Sludge and screenings from the wastewater plant are also unaddressed.
- 15.36. Construction and demolition waste information is similarly insufficient for five Nissen huts, asbestos-containing material, concrete and hardstanding, excavated soil, foundations, drainage and eventual decommissioning. A Site Waste and Materials Management Plan should set a hierarchy of prevention, reuse, recycling and disposal; quantify streams; identify licensed routes/facilities; control asbestos and contaminated arisings; establish collection routing and timing and compound design; and demonstrate how modular units will be reused or responsibly removed at the end of the permission.

Foul Water and Wastewater Treatment

- 15.37. The final foul-water strategy is not confirmed with existing sewers and pump capacity are uncertain. Initial occupation may depend on cesspool storage and tankering, but the submitted drainage material states that tankering is not viable at full occupancy. Bicester Wastewater Treatment Works is mentioned as a possible receiver subject to capacity; no written acceptance is provided. The longer-term alternatives include public-sewer connection, or a new on-site treatment works and outfall, but the design, receiving water, land rights, permit, odour and noise control, sludge removal, flood resilience and construction programme are absent.
- 15.38. Natural England's satisfaction for EIA-screening purposes with a described interim approach is relevant to likely significant effects on the SSSI; it is not proof that a lawful and operationally resilient scheme exists for every phase. Before permission, Thames Water and the Environment Agency should confirm the feasible route,

capacity and permit position. Each phase must be capped to commissioned capacity, with storage, alarms, dual pumps/power, emergency retention, interruption and spill response, tanker frequency/routing and no occupation until the relevant permanent or interim system is operational.

Surface Water and Flood Risk

- 15.39. The flood baseline is internally inconsistent. The Flood Risk Assessment says no flooding has been recorded, while the Drainage Design Statement records the MOD site team's account of frequent surface-water flooding, failed and unverified pumps, blocked drains and poor maintenance, and the Utilities Assessment records ponding even in dry conditions. These statements may use different areas or definitions, but they must be reconciled on a single plan.
- 15.40. The EIA screening relies on no new hardstanding and greenfield runoff. The Drainage Design Statement identifies the lowest Phase 1 area as lacking suitable attenuation, so restriction to greenfield rates is not currently achievable, and refers to approximately 440m² of new impermeable drop-off area without greenfield control. It also defers CCTV survey, levels, hydraulic modelling and final outfalls. The Secretary of State and Natural England must be asked whether their conclusions remain valid for the design actually proposed.
- 15.41. Sleeping accommodation of this nature requires a cautious vulnerability classification under NPPF Annex F. The applicant should identify the classification relied upon, undertake any required sequential assessment, and overlay every building, escape route, critical plant, attenuation feature and finished level with fluvial and surface-water extents including climate change. Safe access/egress, exceedance routes, pump failure, no increased risk elsewhere and long-term maintenance must be demonstrated and agreed by the LLFA before determination.

Ecology, Biodiversity and Trees

- 15.42. The preliminary appraisal identifies potential for badger, dormouse, bats, nesting birds, great crested newt, reptiles and invertebrates and lists further surveys. The site adjoins a Conservation Target Area and is in an SSSI impact-risk zone. The applicant proposes to use later surveys to inform a future masterplan and mitigation. That reverses the mitigation hierarchy: survey results should first inform where development, access, drainage and lighting can be located and is direct opposition to how the Government requires development proposals to proceed. The season for surveys is ending as of Autumn 2026 so any reports would likely need to be undertaken in Spring / Summer of 2027.
- 15.43. Natural England's August 2026 advice referred to in the screening statement, and the information on which it relied, should be published where non-sensitive. The applicant should clarify whether the statutory biodiversity-gain condition applies to this urgent Crown proposal and provide the required baseline, metric, habitat plan and long-term arrangements if it does. Whether or not mandatory BNG applies, adopted ESD10 / ESD11 require avoidance, mitigation and proportionate enhancement.

Contamination, Asbestos and Unexploded Ordnance

- 15.44. The former military use, made ground, asbestos-containing materials and former munitions handling are material to land suitability, especially for sleeping accommodation and outdoor recreation. The preliminary geo-environmental report recommends targeted intrusive investigation and asbestos surveys; the UXO report does not rule out UXO and allows for a detailed risk assessment. NPPF P2 expects adequate site-assessment information from a competent person before these judgments are made.
- 15.45. A phase-specific investigation strategy should distinguish evidence necessary before permission from detail before works. At minimum, the decision-maker needs evidence that remediation and safe construction are feasible without unacceptable effects on groundwater, drainage, ecology or programme. No accommodation phase should be occupied until investigation, remediation, verification, unexploded-ordnance measures and asbestos removal relevant to that phase are complete and independently reviewed.

Fire, Emergency Access, Noise, Air Quality and Infrastructure

- 15.46. The Fire Strategy is necessarily generic because building positions, heights, uses, compartmentation, external wall build-ups, separation, escape distances, assembly points, hydrants, water supply and appliance routes are not fixed. One- and two-metre module separations discussed for daylight cannot be assumed to provide fire separation. A competent fire and rescue response is required on the proposed layout before permission, with independent fire-service consultation and without sole reliance solely on later Building Regulation compliance.
- 15.47. Noise and air-quality effects arise from construction, demolition, traffic, generators, wastewater plant, pumps, HVAC, kitchens, public address systems, outdoor recreation and people. Submitted conclusions rely on future siting, modern plant and management measures. A fixed layout and cumulative assessment are required, including HMP Bullingdon, evening/night operation and sensitive users on and off site. Conditions can then secure equipment limits, acoustic treatment, hours and monitoring.
- 15.48. Water-supply capacity, electricity connection, telecommunications, fire water, emergency planning, policing, ambulance, healthcare and waste collection are each assumed rather than supported by provider commitments. The existence of a possible technical solution does not show it can be delivered before occupation. NPPF HC3 and INF1 require the timing and capacity of necessary infrastructure to be demonstrated and secured.
- 15.49. The request to retain broad permitted-development rights for Crown operational and emergency development also requires care. Uncontrolled later buildings, security works, plant or hardstanding could defeat the assessed envelope. Any permission should remove or tightly limit relevant rights to the extent lawfully possible and require approval for material changes, while recognising genuinely necessary emergency powers.

15.50. Information Required Before Determination

15.51. The Council requests the following consolidated package. It should be a unified scheme, distinguishing open from genuinely sensitive material and be followed by a further reasonable representation period.

Definition and design

- A proposed site / masterplan fixing each phase, building and compound use, footprint, access, road, footpath, parking, servicing, open space, drainage, landscape buffer and retained feature.
- Proposed floor plans, elevations, sections, finished levels, roof and plant plans and a schedule of use, capacity, floor area and maximum height for every component.
- An amended parameter plan capped at the 6 metre envelope assessed, or new EIA and landscape and design evidence for every higher element; a design code controlling massing, materials, colour, reflectivity, accessibility and living conditions.
- A reconciliation of the areas involved (17,350 or 17,935m²), the full status of all elements and the mechanism for public scrutiny of any later design approval.

Urgency and engagement

- A current timetable, or critical-path programme, first-occupation dates and quantified consequences of a proportionate information / reconsultation period, explaining the missed July / August assumptions.
- A statement of pre-application engagement, issues raised, scheme changes and continuing community/parish involvement.

Operation, community and services

- A full enforceable Operational Management Plan, with non-sensitive movement, visitor, staffing, welfare, health, safeguarding, recreation, worship, complaints, incident and decommissioning provisions.
- A Community Impact, Cohesion and Liaison Plan based on assessment of Piddington, Upper Arncott, Hillside Park and other receptors, including daily small-group movement and monitoring and remedial triggers. This should include a methodology of how movements to and from the site will be monitored and controlled, if a sign-in, sign-out remit is considered the appropriate direction for the site.

- Written, costed and phase-specific commitments from health commissioners and providers, police, fire, ambulance and other affected public services, operational from first occupation.

Transport

- OCC-agreed transport assessment/travel plan using site-specific multi-modal evidence and reasonable scenarios, including all construction, tanker, waste, fuel, service-user, staff, visitor and taxi and HMP cumulative movements.
- A safe access, pedestrian and cycle strategy, speed/crossing evidence, access-role reconciliation, swept paths and routing agreement review.
- A funded shuttle specification with destinations, frequency, hours, capacity, accessibility, backup and monitoring.

Water, drainage and flood

- A phase-specific foul strategy with written receiving capacity, outfall / land-rights / permit position, treatment-works design, tanker calculations and failure contingencies.
- CCTV survey, levels, infiltration and ground tests, hydraulic model, greenfield-rate / storage/treatment design, exceedance and maintenance plan agreed by the LLFA.
- A reconciled flood baseline, vulnerability/sequential-test position and overlay of all development, routes and critical plant; reconciliation with the EIA screening and Natural England advice.

Environment and safety

- Completed seasonal ecology surveys, arboricultural impact assessment, BNG clarification and metric, lighting assessment and integrated landscape and ecology plan.
- Phase-specific contamination, asbestos and UXO investigation sufficient to establish feasibility, with remediation and verification strategy.
- A layout specific fire strategy, emergency access and hydrant plan and fire-service response; noise, odour and air-quality assessments for all plant and activities.
- Details and methodologies of the decommissioning and restoration following cessation of activities on the site and relevant timescales.

Climate, energy and waste

- An Energy and Sustainability Statement with energy hierarchy, whole-life carbon, overheating, water efficiency; grid, renewables and heat-pump feasibility; generator impacts and resilience.
- An operational and construction and decommissioning waste and materials plan quantifying all ordinary, food, clinical, sanitary, hazardous, asbestos, sludge and demolition streams and collection routes.

Consultation and security

- Publication of all non-sensitive additional information and material August Natural England correspondence; confirmation of what sensitive information has been reviewed.
- Appointment of a security-cleared independent planning adviser where withheld information is material, with a publishable summary and a renewed representation period.

Protective Controls if the Secretary of State Is Minded to Approve

15.52. These controls are a fallback and do not overcome the pre-determination deficiencies. These are very high-level considerations and final wording should be settled with CDC, OCC and relevant consultees prior to determination, satisfy the six tests for conditions and identify the authority responsible for discharge and enforcement.

Defined permission

Approved plans and schedule fixing the red line, phases, population, floorspace, building-specific heights and all operational development; no deviation outside an agreed minor-change protocol. Any permission should include an enforceable occupancy cap, appropriate monitoring mechanisms (including monitoring fee) and a clear restoration and decommissioning strategy.

Time and restoration

Ten-year cessation date, no extension without fresh permission, phased decommissioning, removal of modular buildings/plant/hardstanding not retained, land restoration and aftercare.

Phased occupancy caps

No phase occupied above its approved cap or before every transport, foul/surface-water, health, fire, power, waste, landscape and management prerequisite for that phase is operational.

Height

Accommodation capped at 6 metres unless a higher identified element has been fully assessed and approved; no blanket 12 m allowance.

Design approval

Detailed layout, elevations, materials, living conditions, accessibility, privacy, daylight and ventilation, recreation, refuse, plant and signage approved before relevant construction.

Operational management

Full plan approved before occupation; staffing, resident movement support, visitors, safeguarding, healthcare, welfare, noise, complaints, liaison, incidents and review; binding on replacement providers.

Community liaison

Pre-occupation liaison group, 24/7 contact, published response standards, regular public monitoring and specified review/remedial triggers.

Transport

Physical access and pedestrian network, funded shuttle and travel plan before occupation; CTMP, routing, delivery booking, tanker/waste/fuel controls, monitoring and corrective measures.

Foul water

No occupation until the relevant permitted system and receiving capacity operate; tankering only within a quantified cap and period, with storage, alarm, power and incident contingency.

Surface water / flood

LLFA-approved SuDS and flood plan before each phase, greenfield rates, treatment, exceedance, pump failure, maintenance and no building/critical route in unacceptable risk areas.

Ecology / trees / BNG

Pre-works surveys, licences, avoidance and mitigation, retained vegetation, construction protection, lighting controls, enhancements and monitoring and management for the required period.

Landscape and lighting

Integrated scheme implementing the Landscape Officer requirements; low-reflectance materials; dark-sky lighting limits, curfew and verified post-installation testing.

Contamination / UXO / asbestos

Investigation, remediation, verification, unexpected-contamination protocol, controlled asbestos removal and UXO measures before affected works/occupation.

Fire and emergency

Approved layout-specific fire and emergency plan, appliance access, hydrants/water, evacuation/assembly, drills and multi-agency review before occupation.

Noise / air / odour

Plant and activity limits, acoustic and odour controls, hours where appropriate, baseline and compliance monitoring, complaints and remedial action.

Energy efficiency and waste

Energy efficiency and low-carbon measures installed before occupation; generators limited and transition plan; waste hierarchy, secure compounds, specialist streams and licensed collections.

Archaeology

Written scheme of investigation, monitoring, reporting and archive before disturbance.

Permitted development

Removal or restriction, insofar as lawful and necessary, of rights that could materially change height, floorspace, hardstanding, plant, security works or environmental effects.

Human rights and equalities

- 15.53. The Council must have due regard to the Human Rights Act 1998 and the Public Sector Equality Duty under section 149 of the Equality Act 2010 when formulating its consultation response. The assessment should address the effects of the

planning proposal on neighbouring communities and on the prospective occupants of the site insofar as those effects are relevant to land-use planning, including accessibility, disability, health, safeguarding, religious/cultural needs and community relations.

15.54. The Human Rights Act 1998 (“HRA”) sets out fundamental freedoms which have been laid out by the European Convention on Human Rights (“ECHR”). In making any decisions, Cherwell District Council (“the Council”) should have due regard to and take into account any implications that may arise under the HRA. As a public authority, it is unlawful for the Council to act in a manner which is incompatible with the ECHR.

15.55. The rights under the ECHR which the Council views as being the most likely to affect planning matters are: Article 6 (the right to a fair trial); Article 8 (right to respect for private and family life); Article 14 (prohibition of discrimination); and Article 1 of the First Protocol (protection of property).

Article 6

15.56. Officers have considered these matters and have resolved that, whilst there are potential rights in play, these will not be affected by the application due to the application being publicised appropriately giving affected third parties the opportunity to comment on the application and their views taken into account when considering the application. In this case comments and concerns raised by third parties are directed to MHCLG and should be taken into account in assessing the application. Furthermore, should the Council or a third party be concerned about the way the application was decided they could complain to the Local Government Ombudsman or if they question the lawfulness of a decision can appeal to the Courts for Judicial Review of the application.

Article 8 and Article 1 of the First Protocol

15.57. Officers have considered the duties under both Article 8 and Article 1 of the First Protocol and have resolved that the application could potentially interfere with the private and family life of neighbours and, therefore, might fail to protect neighbours’ property. Officers consider that this could be in breach of Article 8 / Article 1 of the First Protocol.

15.58. S149 of the Equalities Act 2010 (“EA”) sets out what is known as the Public Sector Equality Duty (“PSED”). Under the PSED, the Council, as a public authority, must have due regard to the need to, inter alia, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and has to foster good relations between persons who share a relevant protected characteristic and persons who so not share it. The protected characteristics to which the PSED refers are: (a) age; (b) disability; (c) gender reassignment; (d) pregnancy and maternity; (e) race; (f) religion or belief; (g) sex; (h) sexual orientation.

15.59. Officers have considered the application and resolved that none of the protected characteristics is affected or potentially affected by the application.

Environmental Impact Assessment Screening

- 15.60. The Secretary of State's 26 August direction concludes that the scheme is not EIA development. The Council does not advance the mere absence of an Environmental Statement as a stand-alone objection. It does, however, identify whether the project screened is the project for which permission is sought.
- 15.61. The screening is explicitly based on accommodation no higher than 6 metres, no additional hardstanding and greenfield surface-water discharge. The approval plan permits 12 metres, and the drainage material describes a new impermeable area and a part of Phase 1 where greenfield restriction is not currently feasible. The screening also assumes mitigations and later designs that are not secured by a fixed scheme. Those differences should be referred back to the Secretary of State for review or an addendum before determination. If the reconciled project could give rise to likely significant effects, the statutory consequences should follow.

16. PLANNING BALANCE AND CONCLUSION

- 16.1. Substantial weight is given to the national importance of asylum accommodation, the Home Office's statutory functions, operational resilience, reducing hotel reliance, reuse of previously developed land and the potential benefits of modular delivery and on-site services. The Council does not object because of the identity or status of future residents and does not discount the Government's objective of delivery during 2026.
- 16.2. At present those benefits are attached to a concept rather than a sufficiently defined full development. The broad 12-metre envelope is inconsistent with the 6-metre scheme screened and assessed. There is no proposed layout or architecture. Fundamental foul-water, surface-water, access, health, power, waste, fire, ecology and land-quality solutions remain unproven. The operating model on which community and transport conclusions depend is incomplete. Several effects are proposed to be resolved only after permission, when they may constrain or determine the layout itself.
- 16.3. The absence of evidence is not automatically proof of harm, but where the applicant bears the burden of describing the proposal and demonstrating acceptable effects, unresolved ambiguity cannot be treated as a neutral factor. The Council cannot find compliance with the adopted plan or current NPPF, and cannot be satisfied that necessary infrastructure and mitigation are feasible and available by first occupation.
- 16.4. The claimed urgency does not justify an avoidable risk to occupiers, local communities or the environment. The current programme already differs materially from that used to justify late-August permission. Requiring a coherent scheme, targeted essential evidence and a renewed, reasonable period of consultation is proportionate and consistent with the Government's own urgent Crown guidance.

- 16.5. The recommended response is therefore a formal objection to the application's determination and any grant of the current scheme. If the Secretary of State supplies and consults on the information in section 15.50, the Council can reassess the balance. If the application is determined without it, the unresolved definition, lack of meaningful detail or assessment and limited feasibility matters justify withholding permission.

17. DRAFT FORMAL RESPONSE TO THE SECRETARY OF STATE

- 17.1. Cherwell District Council acknowledges the national importance and asserted urgency of providing suitable asylum accommodation and gives substantial weight to the reuse of previously developed Crown land and the objective of reducing reliance on hotels and widespread impacts in established communities across the country. The Council's objection is not to the characteristics or immigration status of prospective occupiers; it concerns the land-use acceptability of the development presented and the level of detail submitted.
- 17.2. The Council objects to the grant of planning permission on the information presently available. The application does not contain a proposed site layout, floor plans, elevations, sections or levels and therefore does not define the location, scale, form or relationship of the accommodation and essential infrastructure. The broad plan allowing operational development up to 12 metres is inconsistent with the 6-metre development expressly assessed in the EIA screening direction and landscape material. Surface-water assumptions used in screening also conflict with the submitted drainage design material.
- 17.3. The Council is not satisfied that safe and sustainable pedestrian access, site-specific transport arrangements, foul and surface-water infrastructure, public-service and healthcare capacity, energy, operational and construction waste, fire safety, living conditions, ecology, trees, contamination, unexploded ordnance, lighting, landscape mitigation and the full operational model have been demonstrated. These matters are fundamental to feasibility and should not be transferred wholesale to post-permission conditions.
- 17.4. The Council requests that the Crown Casework Team uses its power to seek the consolidated information at section 15.50 of this report; publishes non-sensitive additions and the material Natural England advice; appoints an appropriately cleared independent adviser for any material sensitive information; and invites renewed representations for a reasonable period. A revised urgency programme should explain why adequate scrutiny cannot be accommodated now that the applicant's assumed July submission and late-August permission dates have passed.
- 17.5. If the Secretary of State is nevertheless minded to grant permission, the Council asks to be consulted on a complete schedule of conditions and obligations incorporating section 15.52. No phase should be occupied before its safe access, commissioned water and drainage, health and emergency-service provision, power, waste, fire, landscape, ecology and management arrangements are operational, and the permission should not contain a general 12-metre height allowance.