

Case Officer: Rob Duckworth

Applicant: Mark Jackson

Proposal: Outline Planning Application with all matters reserved (except for access) for the expansion of Campsfield Immigration Removal Centre comprising the development of new accommodation blocks and ancillary supporting accommodation, the conversion of existing site infrastructure, demolition of existing structures, creation of additional car parking, landscaping and associated site infrastructure.

Ward: Kidlington West

Councillors: Councillor Lesley McLean & Councillor Lisa Smith

Reason for Referral: Major development / Crown application to be determined by PINS/SoS

Expiry Date: 3 August 2026

Committee Date: 23 July 2026

SUMMARY RECOMMENDATION:

THAT PLANNING COMMITTEE AUTHORISES OFFICERS TO ADVISE THE SECRETARY OF STATE, THE PLANNING INSPECTORATE AND THE HOME OFFICE THAT CHERWELL DISTRICT COUNCIL AS LOCAL PLANNING AUTHORITY RAISES NO OBJECTION IN PRINCIPLE TO THE PROPOSED CROWN DEVELOPMENT SUBJECT TO

1. The Secretary of State being satisfied that the submitted national need, operational need and security evidence justifies the proposed expansion of Campsfield Immigration Removal Centre.
2. The Secretary of State being satisfied that the proposal constitutes Grey Belt development which is not inappropriate development for the purposes of the National Planning Policy Framework, or, in the alternative, that very special circumstances exist which clearly outweigh the harm to the Green Belt and any other harm.
3. The imposition of planning conditions
4. The imposition of a legal agreement to mitigate the impact of the development

MAIN REPORT

1. APPLICATION SITE AND LOCALITY

- 1.1. Campsfield Immigration Removal Centre (IRC) is located at Evenlode Crescent, Kidlington, to the south of Langford Lane and south of London Oxford Airport. The site lies between Kidlington and Begbroke and forms part of the wider Langford Lane corridor, which contains a mix of airport-related, commercial, employment, institutional and residential uses.
- 1.2. The application site extends to approximately 4.37 hectares and comprises the existing Campsfield Immigration Removal Centre and associated operational land. The established use of the site is within Use Class C2A as a secure residential institution. The site was originally developed and operated as a youth detention facility before becoming an Immigration Removal Centre in the early 1990s. The IRC subsequently closed in 2018, but the Home Office decided to reopen the facility in 2022. Following refurbishment works and reconfiguration, the IRC reopened in December 2025 with a reduced operational capacity of up to 160 detained persons.
- 1.3. The existing site comprises a secure institutional complex with single and two-storey buildings, secure yards, ancillary buildings, prefabricated units, a multi-use games area, hardstanding, internal access roads, car parking, security fencing, gates, lighting and operational infrastructure. The main secure compound is enclosed by high-level security fencing, with mature vegetation around parts of the site boundary. Existing car parking is located to the north-east of the secure compound.
- 1.4. The site is accessed from Langford Lane via Evenlode Crescent. There are two access roads known as Evenlode Crescent. The eastern road provides access to the ambulance station and the IRC. The western road provides emergency access to the IRC via the National Tactical Response Group facility and also serves residential properties on Evenlode Crescent. Langford Lane links to the A4260 Oxford Road/Banbury Road corridor and to the wider Kidlington and Oxford transport network.
- 1.5. The surrounding area is mixed in character. London Oxford Airport lies to the north beyond Langford Lane. Oxford Technology Park lies to the east and is now substantially developed. Agricultural land lies to the south and west. A small number of residential properties are located on Evenlode Crescent to the north-west of the IRC. Begbroke lies further to the south-west, and Kidlington lies to the south-east. The site and surrounding land lie within the Oxford Green Belt.

2. CONSTRAINTS

- 2.1. The main planning constraints relevant to the proposal are:
 - Oxford Green Belt;
 - land between Kidlington and Begbroke, where settlement separation and the perception of coalescence are important considerations;
 - the site's location within the Langford Lane corridor, close to London Oxford Airport and within airport safeguarding consultation zones;
 - nearby residential receptors, particularly properties on Evenlode Crescent and in Begbroke;
 - existing and proposed development at Oxford Technology Park;
 - nearby ecological interests and the need to consider protected species, habitat impacts, biodiversity net gain and Habitats Regulations matters;
 - mature trees and boundary vegetation;
 - potential ground contamination arising from long-standing institutional use;
 - possible unexploded ordnance risk;
 - surface water drainage and foul drainage capacity;
 - construction traffic and residential amenity implications;

- external lighting and security lighting;
 - public perception, fear of crime, community cohesion and the wider sensitivity of immigration removal centre development.
- 2.2. The site lies in Flood Zone 1 and is therefore at low risk of fluvial flooding. However, the scale of the proposal and increase in hardstanding require a site-specific flood risk assessment and surface water drainage strategy.
- 2.3. There are no designated heritage assets within the application site. However, heritage assets exist in the wider area, and the proposal must be considered in relation to any potential effects on setting, alongside archaeology.

3. DESCRIPTION OF PROPOSED DEVELOPMENT

- 3.1. The application is made by the Home Office under the Crown development procedure. It is an outline planning application with all matters reserved except access.
- 3.2. The submitted description of development is:

“Outline Planning Application with all matters reserved (except for access) for the expansion of Campsfield IRC comprising the development of new accommodation blocks and ancillary supporting accommodation, the conversion of existing site infrastructure, demolition of existing structures, creation of additional car parking, landscaping and associated site infrastructure.”

- 3.3. The accompanying submission material explains that the proposal includes:

- new accommodation blocks;
 - a Care and Separation Unit;
 - a gatehouse;
 - visitors’ reception;
 - faith building;
 - escorts’ rest area;
 - re-use of modular buildings;
 - installation of lighting columns;
 - replacement security fencing and CCTV;
 - a 2m-high fence along the car park boundary;
 - internal zonal fencing;
 - use of existing access and egress;
 - creation of internal roads;
 - rearrangement of existing car parking;
 - creation of additional parking for staff and visitors;
 - associated groundworks and landscaping;
 - demolition of existing structures; and
 - roof-mounted solar photovoltaic panels.
- 3.4. The proposed development would increase the capacity of the IRC from 160 detained persons to up to 400 detained persons, an increase of up to 240. The number of staff would increase from approximately 256 to approximately 432. The existing floorspace is approximately 5,790sqm GIA. The proposal would provide approximately 10,840sqm additional floorspace, resulting in a total expanded floorspace of approximately 16,337sqm GIA.
- 3.5. The largest element would be new accommodation blocks of approximately 9,708 sqm GIA, with a maximum height of up to 16 metres. Other proposed buildings would

generally be single or two-storey ancillary buildings, including the Care and Separation Unit, gatehouse, visitors' reception and escorts' rest area.

- 3.6. The proposal would increase car parking from 97 spaces to approximately 324 spaces, including 57 escort parking spaces. The proposal also includes motorcycle parking, secure sheltered cycle parking and electric vehicle charging provision.
- 3.7. The expanded IRC would operate on a 24-hour basis but visitors would generally attend within defined visiting hours, and the submitted material indicates that the average number of daily visitors is expected to be around 10 to 15 persons. Detained persons would arrive and leave by vehicle, save for limited circumstances where an individual is discharged and collected by family.
- 3.8. The construction period is expected to be approximately 18 months. Construction hours are proposed to be controlled through a Construction Management Plan. The submitted information estimates approximately 3,360 two-way HGV trips over the construction period, with a peak of around 20 HGV movements per day over approximately 20 weeks. Non-HGV construction traffic could be up to 150 vehicles per day during the peak of the works programme.

4. RELEVANT PLANNING HISTORY

- 4.1. The site has an extensive planning history associated with its institutional and secure residential use. The following history is particularly relevant.
- 4.2. Campsfield House was originally built and used as a youth detention centre. It reopened as an Immigration Removal Centre in November 1993, with capacity for up to approximately 280 detained persons. The IRC use continued until the facility closed in 2018. The established planning use of the site is Use Class C2A.
- 4.3. There have been several permissions for operational, ancillary and minor works associated with the IRC use, including accommodation, plant, support buildings and security-related works.
- 4.4. Of particular relevance is application 14/01778/F. This was a previous application for a comprehensive expansion of the IRC, including substantial additional accommodation and ancillary development. That scheme would have increased the capacity of the IRC by around 290 detained persons, resulting in an overall capacity of approximately 566. The officer report for that application concluded that the proposal constituted inappropriate development in the Green Belt, but that very special circumstances existed which, on balance, were capable of clearly outweighing the Green Belt harm and other identified harm. The application was therefore recommended for approval, subject to referral to the Secretary of State, conditions and completion of a section 106 planning obligation agreement. However, the application was subsequently withdrawn before determination following legal objections to the approach taken at that time.
- 4.5. The 2014 application is not determinative of the current proposal. It is, however, a material part of the site's planning history. It demonstrates that the principle of expansion of this established IRC has previously been considered in detail and that officers previously considered a Green Belt very special circumstances case capable of being made. The current proposal must be assessed against the current development plan, the December 2024 National Planning Policy Framework, current national policy on Grey Belt, the updated operational need case and the submitted technical evidence.

- 4.6. Recent works have also taken place to refurbish and reopen the IRC to its previous approved capacity. The Council previously accepted that several refurbishment works were capable of being undertaken under Crown permitted development rights. The site reopened in December 2025.
- 4.7. There is also a relevant pre-application enquiry, 25/02050/PREAPP, discussed below.

5. PRE-APPLICATION DISCUSSIONS

- 5.1. Pre-application discussions took place between the applicant and Cherwell District Council under reference 25/02050/PREAPP. The proposal discussed at pre-application stage was an expansion of the existing IRC to provide additional accommodation and increase the overall capacity to approximately 400 detained persons.
- 5.2. The Council's pre-application advice accepted that the continued use of the site as an IRC is established. The advice identified the main planning issue as whether additional built form and intensified use within the existing IRC site could be accepted in the Green Belt.
- 5.3. The advice concluded that the proposal would be inappropriate development in Green Belt terms unless it could properly be treated as 'Grey Belt' development under the updated national policy framework or otherwise justified by very special circumstances. The advice also noted that the established Campsfield compound has clear Grey Belt characteristics. It is previously developed, long-established, visually contained and part of a wider developed corridor already influenced by large-scale development. The advice nevertheless made clear that the Council had not adopted a formal Green Belt/Grey Belt assessment identifying the site as Grey Belt and that the site remains within the Green Belt for development plan purposes.
- 5.4. The pre-application advice considered that some further intensification of the established IRC site could, in principle, be justified, provided the scheme was compact, well-designed and supported by robust evidence of need and considered alternatives. The advice also identified the need for a detailed Green Belt assessment, justification of a very special circumstances case, a landscape and visual appraisal, noise assessment, lighting assessment, transport assessment, travel plan, construction traffic management plan, flood risk and drainage strategy, ecological assessment, biodiversity net gain strategy, airport safeguarding assessment, ground conditions information and sustainable construction evidence.
- 5.5. The advice concluded that a carefully designed, more compact scheme limited to a total capacity of around 400 detained persons could potentially be capable of support in principle, subject to a robust and up-to-date need case, a strong Green Belt/very special circumstances case and satisfactory technical evidence.
- 5.6. The current submission broadly follows the pre-application advice. The submitted scheme is marginally smaller than the 2014 proposal, would accommodate fewer inmates, seeks to make use of the established IRC site, and is supported by technical evidence, most of which is redacted in some way for the sake of national security, including a:
 - Planning Statement,
 - Statement of National Importance,
 - Design and Access Statement,

- Transport Assessment,
- Travel Plan,
- Landscape and Visual Impact Assessment,
- Ecology Impact Assessment,
- Habitats Regulations Assessment Screening Report,
- Biodiversity Net Gain Assessment,
- Flood Risk Assessment and Drainage Strategy,
- Noise Impact Assessment,
- Lighting Assessment,
- Air Quality Assessment,
- Energy Statement,
- Arboricultural Impact Assessment,
- Contaminated Land Assessment,
- Archaeological Desk-Based Assessment,
- UXO Risk Assessment and,
- Waste Strategy.

6. DEVELOPMENT PROCEDURE, PUBLICITY AND CONSULTATION

- 6.1. This is not a conventional planning application for determination by Cherwell District Council. The application has been submitted by the Home Office under the Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025. The Planning Inspectorate is administering the application process on behalf of the Secretary of State.
- 6.2. Cherwell District Council is a consultee in the Crown development process. The purpose of this report is to enable Planning Committee to consider the planning merits of the proposal and agree the Council's response for submission to the Secretary of State, the Planning Inspectorate and Home Office.
- 6.3. Publicity has been undertaken under the Crown development procedure. A site notice was displayed, and the public were advised that representations should be made directly to the Planning Inspectorate via the Crown development portal or by post. The final date for representations is 24 July 2026. Any public representations will therefore be considered by the Planning Inspectorate and Secretary of State, rather than being received and reported by the Council in the normal way.
- 6.4. The Council has also supplied the required local planning authority questionnaire and background information to the Planning Inspectorate, including planning history, Parish Council details and consultee information. The Council's committee report is therefore not a summary of representations received by the Council. It is a planning assessment of the proposal and a recommendation on the consultation response that should be made by Cherwell District Council.
- 6.5. The Home Office has also requested protection of sensitive information under the relevant Crown development procedure. The submitted material includes redacted public documents and sensitive material that is not intended for publication. Officers have assessed the proposal on the basis of the public material available to the Council and the planning merits of the development. The Secretary of State will need to be satisfied that any sensitive material relied upon by the Home Office properly supports the operational, security and national need case.

7. RESPONSE TO CONSULTATION

- 7.1. The consultation responses are to be reported to the Secretary of State / The Planning Inspectorate and not through Cherwell District Council. Responses should be available to view in full on the Crown Application website.

8. RELEVANT PLANNING POLICY AND GUIDANCE

- 8.1. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.2. 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 several 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;
- ESD2 – Energy Hierarchy and Allowable Solutions;
- ESD3 – Sustainable Construction;
- ESD4 – Decentralised Energy Systems;
- ESD5 – Renewable Energy;
- ESD6 – Sustainable Flood Risk Management;
- ESD7 – Sustainable Drainage Systems;
- ESD10 – Protection and Enhancement of Biodiversity and the Natural Environment;
- ESD13 – Local Landscape Protection and Enhancement;
- ESD14 – Oxford Green Belt;
- ESD15 – The Character of the Built and Historic Environment;
- ESD17 – Green Infrastructure;
- Kidlington 1 – Accommodating High Value Employment Needs; and
- INF1 – Infrastructure.

CHERWELL LOCAL PLAN 1996 SAVED POLICIES (CLP 1996)

- C15 – Prevention of coalescence of settlements;
- C28 – Layout, design and external appearance of new development;
- C31 – Compatibility of proposals in residential areas;
- ENV1 – Development likely to cause detrimental levels of pollution; and
- ENV12 – Contaminated Land.

- 8.3. Other Material Planning Considerations:

- National Planning Policy Framework, December 2024;
- Planning Practice Guidance;
- Cherwell Residential Design Guide SPD;
- Kidlington Framework Masterplan SPD;
- Cherwell Developer Contributions SPD;
- Oxfordshire County Council transport, street design and parking guidance;

- Environment Act 2021 biodiversity net gain requirements;
 - Human Rights Act 1998;
 - Equality Act 2010; and
 - Emerging Cherwell Local Plan Review 2042.
- The emerging Cherwell Local Plan Review 2042 is a material consideration but carries limited weight at this stage bearing in mind it has not been fully examined and there are multiple objections to its various policies and proposals. Nevertheless, it provides useful context, particularly in relation to Green Belt, climate change, design, infrastructure and the Langford Lane/Kidlington area, but it does not replace the adopted development plan.

9. APPRAISAL

9.1. The key issues for consideration are:

- procedural status and scope of the Council's response;
- principle of development and national need;
- Green Belt, Grey Belt and very special circumstances;
- use of previously developed land and spatial strategy;
- design, scale, layout and appearance;
- landscape and visual impact;
- residential amenity, including noise, lighting and construction disturbance;
- highways, access, parking, servicing and construction traffic;
- ecology, protected species, Habitats Regulations and biodiversity net gain;
- trees and landscaping;
- flood risk, surface water drainage and foul drainage;
- heritage and archaeology;
- air quality, contamination, unexploded ordnance and waste;
- airport safeguarding and operational safety;
- community impact, public perception, fear of crime, human rights and equalities;
- planning obligations and conditions; and
- planning balance and conclusion.

Procedural status and scope of the Council's response

- 9.2. This application has been submitted under the Crown development procedure and will be determined by the Secretary of State. The Council's role is to provide a local planning authority consultation response, informed by the development plan, national policy, local planning history and the submitted material.
- 9.3. The Council is not issuing a grant or refusal of planning permission. The appropriate recommendation is therefore not to "approve" or "refuse" in the normal development management sense, but whether the Council objects, raises no objection, or raises no objection subject to matters being secured.
- 9.4. Given the scale, its Green Belt location, public interest and sensitivity of the proposal, it is appropriate for Planning Committee to consider and authorise the Council's formal response.
- 9.5. The absence of direct public representations to the Council does not mean that public concern is irrelevant. The proposal is plainly sensitive and likely to generate significant public interest. However, the Crown procedure directs public representations to the Planning Inspectorate. The Council's report therefore focuses on the planning merits and the matters that the Council considers the Secretary of State should take into account in any determination.

Principle of Development and National Need

- 9.6. The existing use of the site as an Immigration Removal Centre is established. The lawful use falls within Use Class C2A as a secure residential institution and the proposal does not introduce a new use in principle; it seeks to expand and intensify the existing use.
- 9.7. The submitted material states that Campsfield IRC reopened in December 2025 following refurbishment works and now has capacity for up to 160 detained persons. The proposals would increase the total capacity to up to 400 detained persons. The Home Office states that this additional capacity is required to support national immigration enforcement objectives, including enforced removals, detention capacity, resilience within the detention estate and the removal of Foreign National Offenders and failed asylum seekers where detention is considered necessary.
- 9.8. The Statement of National Importance explains that the proposal is considered by the Home Office to be nationally important because it supports essential public services and border infrastructure, assists national immigration enforcement, and responds to a significant operational shortfall in detention capacity. The submitted Planning Statement also explains that demand for immigration detention capacity exceeds current supply and that the Home Office is seeking to increase detention capacity to support a higher level of removals.
- 9.9. The Council is not responsible for immigration policy and cannot substitute its own view for that of the Home Office on the national policy need for IRC capacity. The planning question is whether the asserted national and operational need is a material consideration capable of weighing in favour of the development, and if so, how much weight it should be given.
- 9.10. The need case attracts significant positive weight. The proposal would provide national public infrastructure for a function that is the responsibility of central Government. The development would also make use of an existing secure institutional site rather than introducing a new IRC use onto a wholly undeveloped or unrelated site. The existing site has relevant infrastructure, operational history, secure boundaries, access arrangements and an approved C2A use. These factors support the principle of expanding this site rather than establishing an entirely new facility elsewhere.
- 9.11. The proposal would also generate economic benefits, including construction employment, operational employment and local expenditure associated with staff and maintenance. The increase in staff from approximately 256 to approximately 432 would be a material employment benefit, although this is not the principal justification for the scheme.
- 9.12. The proposal is therefore acceptable in principle, subject to Green Belt policy and all other development management considerations.
- 9.13. The key issue is not whether the IRC use is acceptable in principle, but whether the scale of additional built development and operational intensification is acceptable in the Oxford Green Belt.

Green Belt, Grey Belt and very special circumstances

Policy context

- 9.14. The site lies within the Oxford Green Belt. Policy ESD14 of the Cherwell Local Plan 2011–2031 Part 1 states that development proposals within the Green Belt will be assessed in accordance with Government guidance contained in the National Planning Policy Framework and Planning Practice Guidance. Development within the Green Belt will only be permitted if it maintains the Green Belt's openness and does not conflict with the purposes of the Green Belt or harm its visual amenities.
- 9.15. The National Planning Policy Framework identifies the fundamental aim of Green Belt policy as preventing urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence.
- 9.16. The five purposes of including land within the Green Belt are:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 9.17. The construction of new buildings in the Green Belt is inappropriate development unless it falls within one of the identified exceptions in the NPPF. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Substantial weight must be given to any harm to the Green Belt.
- 9.18. The December 2024 NPPF also introduced the concept of Grey Belt. Grey Belt is Green Belt land comprising previously developed land and/or land that does not strongly contribute to specified Green Belt purposes, excluding land where the application of other protected-area policies would provide a strong reason for refusal. Where the relevant NPPF tests are met, development on what is determined to be Grey Belt land may not be inappropriate development.

Existing Green Belt context

- 9.19. The Campsfield IRC site sits within the wider Green Belt gap between Kidlington and Begbroke. That wider gap performs an important planning function. It helps maintain the separate identity of settlements and safeguards open land from encroachment.
- 9.20. However, the application site itself is not an open field or undeveloped countryside. It is a long-established secure institutional complex. It contains permanent buildings, hardstanding, service roads, car parking, security fencing, lighting and fixed operational infrastructure. It is physically and visually enclosed. It is also experienced in the context of the highly developed Langford Lane corridor, London Oxford Airport and Oxford Technology Park.
- 9.21. This distinction is important. The wider Green Belt parcel includes open land which contributes more clearly to openness and settlement separation. The existing Campsfield compound makes a more limited contribution to those purposes because it is already developed, is contained and institutional in character. It does not perform the same Green Belt role as the surrounding open fields.
- 9.22. The pre-application advice reached a similar view. It recognised that the Campsfield compound is previously developed, visually contained and part of a wider corridor influenced by large-scale development. It also noted that the primary Green Belt function of preventing urban sprawl and maintaining separation is performed by the surrounding open land rather than by the already developed compound itself.

Grey Belt assessment

- 9.23. Whilst the site is within the Green Belt, the site has clear Grey Belt characteristics.
- 9.24. The Campsfield compound is previously developed land in practical planning terms. It contains substantial permanent buildings and infrastructure associated with the long-standing secure institutional use.
- 9.25. The developed compound does not strongly contribute to the Green Belt purposes now most directly relevant to the Grey Belt assessment. The site does not contribute materially to checking the unrestricted sprawl of a large built-up area. The land between Kidlington town and Begbroke village, which includes the IRC site is not part of the setting or special character of a historic town. The site's role in safeguarding the countryside from encroachment is reduced by its existing development, its secure enclosure and its relationship/adjacency with other development along Langford Lane.
- 9.26. Although the site lies within the Green Belt and within a sensitive settlement gap, the proposed development would be predominantly contained within or closely related to the existing institutional envelope. The most significant built element, the accommodation block, would be within the secure compound. Development outside the secure compound would mainly comprise car parking and ancillary single-storey buildings in an area already influenced by the IRC and the adjacent ambulance station, residential properties, Oxford Technology Park and airport-related uses.
- 9.27. Furthermore, there are no designated heritage assets, Sites of Special Scientific Interest, National Landscapes, National Parks or other NPPF footnote 7 protected designations within the application site, other than the Green Belt itself. Ecological and environmental matters require careful assessment and mitigation, but they do not appear to provide a freestanding strong reason for refusal.
- 9.28. The Council has not adopted a formal Grey Belt assessment identifying the site as Grey Belt, so the site therefore remains part of the adopted Green Belt. However, Grey Belt considerations are now a material planning consideration. In this case, officers consider that the established Campsfield compound sits towards the Grey Belt end of the Green Belt spectrum.
- 9.29. On balance, Officers consider that there is a credible and persuasive basis for the Secretary of State to conclude that the site, or at least the main developed compound, constitutes Grey Belt for the purposes of the NPPF. If the Secretary of State accepts that conclusion and is satisfied that the other NPPF Grey Belt tests are met, the proposal would not be inappropriate development in Green Belt terms.
- 9.30. Those other tests are considered to be met. There is a demonstrable national need for the development advanced by the Home Office. The site is an existing operational IRC and is accessible to the local highway network, public transport and active travel links. The development would not fundamentally undermine the purposes of the Green Belt across the wider area because it would intensify an established developed site rather than release open countryside for unrelated development.

Harm to openness

- 9.31. Even if the proposal is accepted as Grey Belt development, it remains necessary to assess harm to Green Belt openness.
- 9.32. The proposal would introduce a substantial amount of new floorspace. The main accommodation block would be up to 16 metres high. The development would

increase the mass, scale and intensity of the institutional complex. It would also introduce additional parking, fencing, lighting, movement and operational activity. These changes would undoubtedly cause some harm to openness in both spatial and visual terms.

- 9.33. The harm is moderated by several factors: The site is already developed, and the main development would be contained within or closely related to the existing secure institutional envelope. The site is influenced by substantial existing built development at Oxford Technology Park, London Oxford Airport and the existing IRC. Existing vegetation and proposed structural landscaping would assist in filtering and softening views. The proposal is also marginally smaller than the withdrawn 2014 scheme, which would have increased the total capacity to around 566 detained persons.
- 9.34. The Landscape and Visual Impact Assessment submitted with the application identifies that landscape and visual effects would be localised. It acknowledges that the development would have a visual effect and that some views from public rights of way, roads and residential properties would be affected. It also recognises that the surrounding countryside is already influenced by institutional, commercial, industrial and residential development.
- 9.35. Officers consider that the proposal would result in moderate Green Belt openness harm. The harm is real and attracts substantial weight if the proposal is inappropriate development. However, the harm is not equivalent to developing a wholly open Green Belt site. The proposal is best understood as intensification and expansion of an established secure institutional complex within a developed and visually contained part of the Green Belt.

Settlement separation and coalescence

- 9.36. Saved Policy C15 seeks to prevent development that would harm important gaps between settlements. Policy ESD13 also seeks to protect local landscape character.
- 9.37. The wider land between Kidlington and Begbroke performs a settlement separation function. Public concern about the erosion of this gap is likely to be significant. However, the proposal would not extend built development across the whole gap or create a continuous urban form between settlements. The principal built development would sit within the established IRC compound. The secure perimeter, existing landscape structure and surrounding open land would continue to distinguish the site from Begbroke village and Kidlington town.
- 9.38. The proposal would increase the scale and visibility of development within the gap, and this weighs against the scheme. However, it would not itself cause Kidlington and Begbroke to merge. Nor would it remove the remaining open land that performs the clearest separation function. Subject to landscape mitigation and careful control of height, appearance, lighting and boundary treatments, the impact on settlement separation is considered limited to moderate and not unacceptable in itself.

Very special circumstances

- 9.39. If the Secretary of State does not accept that the proposal is Green Belt development which is not inappropriate, the proposal would constitute inappropriate development in the Green Belt. In that scenario, very special circumstances would be required.
- 9.40. Substantial weight must be given to the Green Belt harm. The proposal would cause harm by reason of inappropriateness, loss of openness, additional built form and some effect on the perception of the gap between Kidlington and Begbroke.

9.41. The factors weighing in favour of the proposal are:

- the established lawful C2A use of the site as an Immigration Removal Centre;
- the use of a long-established secure institutional site rather than a new unrelated site;
- the national need for additional IRC capacity advanced by the Home Office;
- the Statement of National Importance and the role of the proposal in central Government immigration enforcement infrastructure;
- the operational benefits of expanding an existing IRC with established infrastructure and security arrangements;
- the slightly smaller scale of the proposal compared with the withdrawn 2014 scheme;
- the containment of the principal development within the existing secure compound;
- the site's Grey Belt characteristics;
- employment and economic benefits;
- sustainable construction measures, including BREEAM Excellent and solar photovoltaic provision;
- biodiversity net gain and landscape enhancement;
- active travel, public transport and travel planning measures; and
- the ability to control residual impacts through conditions and obligations.

9.42. The national need and operational requirement attract substantial positive weight. The use of an existing IRC site also attracts significant weight. The Grey Belt characteristics of the site reduce, but do not eliminate, the Green Belt objection. The compactness of the scheme and containment within the existing institutional envelope also materially assist the balance.

9.43. Officers therefore consider that, even if the proposal is treated as inappropriate development, the very special circumstances case is capable of clearly outweighing the Green Belt harm and other identified harms, provided the Secretary of State is satisfied that the submitted national need and operational evidence is robust.

Green Belt conclusion

9.44. The Green Belt balance is close and sensitive. The proposal would increase built form and activity within the Oxford Green Belt and would cause harm to openness. That harm is significant in policy terms and must be given substantial weight if the development is inappropriate.

9.45. However, the site is not an ordinary open Green Belt site. It is an established, developed, secure institutional compound within a corridor already influenced by the airport, technology park, and other commercial and institutional development. The proposal would expand an existing C2A use rather than introduce a new use and it would largely remain within the established operational envelope. It is supported by a national need case and a Statement of National Importance.

9.46. Officers consider that the site has clear Grey Belt characteristics and that the proposal can reasonably be regarded as acceptable in Green Belt terms under the updated NPPF approach. If the Secretary of State does not accept that position, Officers consider that very special circumstances exist which are capable of outweighing Green Belt harm and other residual harm.

9.47. Accordingly, Officers do not consider that Green Belt policy should result in an objection from Cherwell District Council, subject to the Secretary of State securing robust conditions, mitigation and any necessary obligations.

Design, scale, layout and appearance

- 9.48. The application is submitted in outline with all matters reserved except access. The detailed layout, scale, appearance and landscaping would therefore be considered at reserved matters stage. However, the submitted parameter plans, indicative layout, Design and Access Statement and visual material show how the proposed quantum of development could be accommodated within the site.
- 9.49. The proposal would introduce a substantial increase in built floorspace. The principal new building would be the proposed accommodation block, which would sit within the existing secure compound and would be the largest element of the scheme. Its maximum height would be up to 16 metres. Other buildings, including the gatehouse, visitors' reception, escorts' rest area, faith building and Care and Separation Unit, would be lower in scale and ancillary to the main institutional use.
- 9.50. The overall design approach is functional and security-led; not unusual for a secure residential institution. The buildings are not intended to operate as public-facing civic architecture and would not be experienced in the same way as buildings within the public realm. The key design question is therefore whether the scale, massing, siting, materials, boundary treatments, lighting and landscape framework can be made acceptable in their Green Belt and edge-of-settlement context.
- 9.51. The main accommodation building is necessarily located within the secure boundary. The submitted material explains that it has been positioned as far north and east as practicable to reduce landscape and Green Belt impacts. This approach is supported in principle. It keeps the largest building within the operational envelope of the established IRC and relates it more closely to existing built form and infrastructure, rather than projecting development further into the more open land to the south and west.
- 9.52. The scheme would nevertheless be large and institutional in character. The accommodation block, new security infrastructure, car parking, lighting and ancillary buildings would increase the visual presence of the IRC. The scale and appearance of the final scheme would therefore need to be controlled carefully at reserved matters stage.
- 9.53. The Council advises the Secretary of State that any permission should be subject to conditions securing:
- compliance with approved parameter plans;
 - maximum floorspace limitations;
 - maximum building height limitations;
 - maximum detained person capacity;
 - maximum staff numbers, or other appropriate operational parameters if considered necessary;
 - details of layout, scale, appearance and landscaping through reserved matters;
 - external materials and finishes;
 - roof plant and plant screening;
 - details of solar photovoltaic canopies and roof-mounted solar panels;
 - detailed boundary treatments, including security fencing and any acoustic or opaque fencing;
 - detailed lighting design;
 - hard and soft landscape design;
 - external storage, refuse and servicing areas; and
 - a phasing plan.

- 9.54. Subject to those controls, the design approach is considered acceptable in principle. The final scheme must be robust, simple and recessive in its external treatment. It should avoid unnecessary visual complexity, reflective materials, excessive lighting spill and visually intrusive plant. The reserved matters submission should demonstrate how the buildings would sit within the existing and proposed landscape structure and how the final design would reduce the visual and Green Belt impact of the development as far as reasonably practicable.

Landscape and visual impact

- 9.55. The site is not within a designated landscape other than within the Oxford Green Belt and within the open land separating Kidlington and Begbroke. Landscape and visual impact is therefore closely related to the Green Belt assessment.
- 9.56. The submitted Landscape and Visual Impact Assessment identifies that the proposal would have localised effects on the non-designated landscape. The development would be apparent in views from public rights of way, local roads and nearby residential properties. The principal visual change would arise from the new accommodation building, the expanded car park, new fencing, lighting and associated security infrastructure.
- 9.57. The LVIA concludes that the surrounding countryside is already influenced by existing and emerging built development, including the existing IRC, London Oxford Airport, Oxford Technology Park, transport corridors, commercial development and residential properties. That conclusion is accepted. The site is not experienced as an isolated undeveloped rural parcel. It forms part of a mixed and already compromised landscape context along Langford Lane.
- 9.58. The LVIA also acknowledges some perception of closing the gap between Kidlington and Begbroke. This is a material harm. The proposal would add further built development within the gap and would increase the institutional character of the site. However, the development would not remove the remaining open land between the settlements and would not create a continuous built-up frontage or a physical merger. The key settlement separation function would continue to be performed by the surrounding open land rather than by the already developed IRC compound.
- 9.59. Existing boundary vegetation to the south and west contributes positively to the local landscape character and provides screening, particularly in summer months. This vegetation should be retained and strengthened wherever possible. The indicative landscaping strategy proposes additional tree and shrub planting, including replacement planting for tree loss and landscape treatment around the car parking areas. This is necessary mitigation and should be secured by condition.
- 9.60. The Council advises that any permission should require:
- a detailed landscape scheme;
 - retention of existing boundary vegetation wherever practicable;
 - protection of retained trees and hedgerows;
 - structural planting to the south and west of the site;
 - landscape treatment to the expanded car park;
 - details of bunding, levels and earthworks;
 - a long-term landscape and ecological management plan;
 - replacement planting for any failed trees or shrubs for an extended establishment period;
 - details of fencing and security infrastructure in relation to landscape impact; and
 - final verified visualisations at reserved matters stage if materially different from the current indicative scheme.

9.61. The proposal would cause landscape and visual harm. That harm would be localised and must be weighed in the Green Belt balance. It is not considered to be so severe as to justify an objection in its own right, given the context and provided that the final scheme is controlled through reserved matters and robust landscape conditions.

Residential amenity: noise, lighting, outlook, privacy and construction disturbance

9.62. The nearest residential receptors are properties on Evenlode Crescent. There are also residential receptors further away in Begbroke and Kidlington. Given the scale and sensitivity of the proposed use, the potential impacts on neighbouring residents must be considered carefully.

9.63. The main amenity issues are:

- increased activity from staff, service vehicles, visitors and escort vehicles;
- expanded car parking;
- operational noise;
- plant and equipment noise;
- external lighting and security lighting;
- visual impact from increased built form and fencing;
- construction noise, dust and disturbance;
- construction traffic; and
- public perception and anxiety associated with the expanded IRC use.

9.64. The submitted Noise Impact Assessment identifies that baseline noise levels at the site are relatively low. It concludes that the site is suitable for the proposed use and that no onerous acoustic design requirements are needed for the proposed accommodation. It also concludes that predicted car park noise may exceed background noise levels at night, but that absolute noise levels would remain low and are unlikely to cause disturbance to the nearest dwellings on Evenlode Crescent. Plant noise limits have been identified, and acoustic mitigation can be used to ensure those limits are met.

9.65. That conclusion is reasonable at outline stage, but it requires detailed control. The development would operate 24 hours a day, so staff shift changes, escort movements, plant, standby generators and car park activity could all affect neighbouring residents if not controlled properly. Any permission should therefore secure:

- maximum operational plant noise limits at the nearest noise-sensitive receptors;
- details of all fixed plant and equipment before installation;
- acoustic screening where required;
- restrictions on testing of standby generators;
- details of car park surfacing and management;
- a noise management plan for the operational site;
- a construction environmental management plan;
- construction hours;
- piling or other high-noise activity controls;
- a complaints procedure; and
- post-installation acoustic verification where necessary.

9.66. Lighting is also a sensitive issue. Secure institutions require external lighting for safety and security. However, the site adjoins open land and nearby residential properties. It also has ecological constraints, including boundary habitats used by protected or notable species.

9.67. The submitted lighting information indicates that the site has been assessed as an E3 medium district brightness area. The submitted material explains that opaque fencing

would reduce light spill from inside the site and that photovoltaic canopies over the car park would help limit upward light transmission. The outline lighting design is said to provide low-energy lighting with no upward light and impacts below the proposed criteria.

9.68. The Council is inclined not to object to the proposal on lighting grounds at outline stage, but the final lighting scheme must be tightly controlled. Any permission should therefore require:

- a detailed operational lighting scheme;
- horizontal and vertical lux contour plans;
- details of column heights, luminaire types and shielding;
- colour temperature;
- dimming and timing controls where compatible with security requirements;
- confirmation of no unnecessary upward light spill;
- sensitive treatment of boundary areas for bats and other wildlife;
- details of construction lighting; and
- post-installation compliance testing.

9.69. In terms of outlook and privacy, the site is not a conventional residential development and the new buildings would be within or closely related to the existing secure compound. The proposal is unlikely to result in unacceptable overlooking of residential properties, subject to the detailed siting, massing and window treatment being considered at reserved matters stage. The greater effect on residents is likely to be visual change and perceived enclosure from the expanded car park, fencing, lighting and built form. This can be mitigated, though not eliminated, through bunding, planting, fencing design and careful lighting control.

9.70. Construction impacts would be temporary but significant. The construction period is expected to last approximately 18 months. The submitted information identifies a notable number of HGV and construction worker vehicle movements, including a peak period of more intensive construction activity. Given the proximity of residential properties and the use of Evenlode Crescent, a robust Construction Environmental Management Plan and Construction Traffic Management Plan are essential.

9.71. Subject to those controls, Officers consider that the development would not cause unacceptable residential amenity harm. There would be some adverse effects, particularly during construction and from the increased scale and activity of the operational site. Those effects weigh against the proposal, but they are capable of being mitigated to an acceptable level.

Highways, access, parking, servicing and construction traffic

9.72. The application seeks detailed approval for access. All other matters are reserved.

9.73. The existing access to the IRC is from Evenlode Crescent, which connects to Langford Lane. The proposal would retain the existing access arrangement. The submitted access information indicates that Evenlode Crescent is approximately 5.2 metres wide and that pedestrian improvements have already been provided as part of the site refurbishment works. A footway is now present along the eastern side of Evenlode Crescent, with lighting and connections to the wider pedestrian network.

9.74. The proposal includes a new pedestrian crossing on Langford Lane to improve access to the nearby bus stop on the opposite side of the road. The submitted material states that this mitigation has been discussed with the Local Highway Authority. The Council should support this measure in principle, subject to final technical approval by Oxfordshire County Council.

9.75. The Transport Assessment identifies an increase of approximately 61 two-way vehicle trips during both the AM and PM peak hours. The submitted case is that this level of traffic would have a negligible impact on the local highway network and would fall within normal daily variation in traffic flows. That appears reasonable in principle, subject to Oxfordshire County Council confirming that the network assessment, trip generation, distribution and junction analysis are acceptable.

9.76. The proposal would increase car parking from 97 spaces to approximately 324 or 325 spaces. This includes operational parking and escort parking. The scheme also proposes 41 secure cycle parking spaces and 25% electric vehicle charging provision. The submitted Travel Plan identifies that the nearest bus stop is approximately 250 metres from the site access and that services connect the site to Kidlington, Oxford, Oxford Railway Station, Oxford Parkway, Woodstock, Chipping Norton and Banbury. Oxford Parkway is accessible by bus, and the site is near existing and proposed cycle infrastructure, including the wider Langford Lane corridor.

9.77. The expanded parking provision is substantial. However, the use is operationally unusual. It requires staff parking, shift-working provision, visitor parking, escort parking and secure operational vehicle movements. The development is not comparable with a standard office, residential or community use. A degree of bespoke parking provision is therefore justified. The key issue is whether the amount of parking is operationally necessary and whether it would undermine the sustainable transport objectives of the development plan.

9.78. Officers consider that the proposed parking is acceptable in principle, subject to detailed justification and management. The Council advises that any permission should secure:

- final car parking layout;
- accessible parking;
- electric vehicle charging;
- motorcycle parking;
- secure and covered cycle parking;
- car park lighting;
- car park landscaping;
- car park management;
- retention of parking for the approved use only;
- travel plan monitoring; and
- implementation of active travel and public transport measures.

9.79. The submitted Travel Plan includes measures such as a Travel Plan Coordinator, staff welcome packs, personal journey planning, walking and cycling information, safe and secure cycle parking, public transport information, promotion of car sharing and monitoring through travel surveys. Surveys are proposed within six months of occupation and at years 1, 3 and 5. This is appropriate in principle, although the Travel Plan should be secured, monitored and enforceable through a legal obligation or equivalent binding mechanism.

9.80. The submitted draft Heads of Terms refer to:

- Travel Plan measures to Oxfordshire County Council as Local Highway Authority;
- public transport and active travel contributions; and
- monitoring fees to Oxfordshire County Council.

- 9.81. These heads of terms are considered appropriate in principle. The final form and value of any obligation should be agreed with Oxfordshire County Council and must meet the statutory Reg.122 tests of necessity, direct relationship and scale/kind.
- 9.82. Construction traffic is a more sensitive issue. The construction period would be approximately 18 months and would generate HGV and worker traffic. The submitted Outline Construction Management Plan includes a framework Construction Traffic Management Plan. Given the residential properties on Evenlode Crescent and the existing traffic environment on Langford Lane, this matter should be controlled by condition.
- 9.83. Any permission should require a detailed Construction Traffic Management Plan covering:
- construction access routes;
 - HGV routing;
 - delivery hours;
 - construction worker parking;
 - compound location;
 - wheel washing;
 - road cleaning;
 - traffic marshal arrangements;
 - temporary pedestrian and cycle safety measures;
 - management of abnormal loads if required;
 - communication with local residents; and
 - monitoring and enforcement arrangements.
- 9.84. Subject to Oxfordshire County Council raising no objection and subject to conditions and obligations, the proposal appears acceptable in highway safety, access, parking and transport terms.

Ecology, protected species, Habitats Regulations and biodiversity net gain

- 9.85. The application is supported by ecological information, including an Ecological Impact Assessment, Habitats Regulations Assessment Screening Report and Biodiversity Net Gain Assessment.
- 9.86. Ecological surveys have been undertaken between 2023 and 2025. The submitted Planning Statement identifies that the site supports an active badger sett and a very low population of common lizard. The site also has potential to support widespread amphibians, nesting birds, foraging and commuting bats, notable plant species and widespread mammals, including brown hare, rabbit and hedgehog.
- 9.87. The submitted ecological strategy proposes mitigation and enhancement measures, including precautionary working methods, sensitive layout design, retention of boundary habitats where possible, wildlife-friendly landscaping, sensitive construction and operational management, and a Construction Environmental Management Plan. A Natural England licence would be required to permanently close a badger sett.
- 9.88. The Council advise that the Secretary of State must be satisfied that protected species impacts can be lawfully and appropriately mitigated. Any permission should require:
- updated ecological surveys where necessary;
 - no works affecting the badger sett until any required Natural England licence has been obtained;
 - a Construction Environmental Management Plan for biodiversity;

- precautionary working methods for reptiles, amphibians, nesting birds, mammals and bats;
- timing restrictions for vegetation clearance;
- bat-sensitive lighting design;
- ecological clerk of works supervision where required;
- biodiversity enhancement measures;
- bird and bat boxes or integrated features where compatible with security requirements;
- hedgehog/small mammal permeability where compatible with security requirements;
- a Landscape and Ecological Management Plan; and
- long-term monitoring.

9.89. The site lies within the 10km impact zone of Oxford Meadows Special Area of Conservation. The submitted HRA Screening Report concludes that no likely significant effects are anticipated, including in relation to air quality, water levels, pollution or recreational pressure.

9.90. The nature of the use is relevant because detained persons would not generate recreational pressure on the SAC in the same way as new housing.

9.91. As determining authority, the Secretary of State will need to act as competent authority under the Habitats Regulations. The Council advises that it raises no objection in principle, subject to the Secretary of State being satisfied, in consultation with Natural England where necessary, that the proposal would not result in likely significant effects on Oxford Meadows SAC either alone or in combination with other plans and projects.

9.92. The application is subject to mandatory biodiversity net gain. The submitted BNG Assessment indicates that, based on the indicative scheme, the development would result in a net loss of area and linear habitats. Due to the operational constraints of the site and the limited land available for meaningful habitat creation within the secure compound, the applicant proposes to provide the required 10% BNG through off-site provision, alongside on-site biodiversity improvements. The applicant has identified the Trust for Oxfordshire's Environment as the proposed BNG provider and has agreed a unit pre-purchase.

9.93. This approach is acceptable in principle. However, it must be secured before any permission is issued or before development commences, as appropriate under the statutory biodiversity gain regime. The Council advises that any permission must secure:

- a biodiversity gain plan;
- use of the statutory metric;
- details of on-site habitat retention and enhancement;
- full off-site BNG provision;
- legal security for off-site units for the required period;
- monitoring and reporting;
- a Habitat Management and Monitoring Plan; and
- consistency between BNG, landscape, drainage and lighting strategies.

9.94. Subject to these controls, the proposal is likely to be acceptable in ecology, HRA and BNG terms.

Trees and landscaping

- 9.95. The application is supported by a tree survey and Arboricultural Impact Assessment. The submitted Planning Statement identifies 43 individual trees and 18 groups of trees within the site. These features vary in age, condition and amenity value.
- 9.96. The indicative layout would require the removal of 26 individual trees and seven groups of trees. That is a significant level of tree loss. It weighs against the proposal, particularly given the importance of boundary vegetation in filtering views and contributing to the local landscape character.
- 9.97. The submitted material indicates that the design process has sought to retain higher-quality trees where feasible and that opportunities for further retention may be considered at reserved matters stage. The indicative landscape plan proposes replacement planting at a ratio of approximately 1:3, with over 100 new trees or shrubs across the site.
- 9.98. The Council advises that tree loss is acceptable only if the Secretary of State is satisfied that the operational need and site layout justify it and that robust mitigation is secured. Any reserved matters submission should be expected to reduce tree loss where practicable.
- 9.99. Any permission should require:
- an updated Arboricultural Impact Assessment at reserved matters stage;
 - an Arboricultural Method Statement;
 - tree protection plans;
 - no-dig construction details where required;
 - supervision by an arboricultural specialist;
 - details of tree removals;
 - replacement tree planting;
 - species selection appropriate to the site, landscape and airport safeguarding context;
 - aftercare and replacement for failed planting;
 - long-term landscape management; and
 - integration with ecological and BNG measures.
- 9.100. Subject to these controls, the tree impacts are capable of being mitigated. The loss of trees is adverse, but it is not considered sufficient to justify an objection in its own right.

Flood risk, surface water drainage and foul drainage

- 9.101. The application site is within Flood Zone 1 and is at low risk of fluvial flooding. The proposed use is therefore acceptable in flood risk vulnerability terms.
- 9.102. The submitted Flood Risk Assessment and Drainage Strategy identify low fluvial flood risk, low-to-medium groundwater flood risk and minimal surface water vulnerability, with any areas of risk capable of mitigation through drainage design. The proposed surface water strategy is based on infiltration through soakaways and attenuation tanks. Groundwater monitoring is ongoing and is intended to inform the final drainage design.
- 9.103. The proposed foul drainage would discharge to the Thames Water pumping station, which is to be relocated within the site as part of the development. This requires agreement with Thames Water and appropriate conditions.

9.104. The proposal is likely acceptable in principle in flood risk terms. However, the final surface water and foul drainage details are critical, particularly given the scale of development, increased hardstanding and need to ensure that flood risk is not increased elsewhere.

9.105. Any permission should require:

- a detailed surface water drainage scheme;
- infiltration testing and groundwater monitoring results;
- detailed SuDS design;
- attenuation details;
- exceedance flow routes;
- water quality treatment;
- maintenance and management arrangements;
- phasing of drainage works;
- details of foul drainage capacity;
- Thames Water approval for any works to, connection with or relocation of the pumping station;
- verification of completed drainage works; and
- restriction on occupation until drainage infrastructure is operational.

9.106. Subject to Lead Local Flood Authority and Thames Water agreement, the proposal is acceptable in flood risk and drainage terms.

Heritage and archaeology

9.107. There are no designated heritage assets within the application site. The site is not within or adjacent to a conservation area. The nearest designated heritage assets are separated from the site by some distance, intervening landform, vegetation and built development. The submitted material identifies no direct line of sight between the application site and nearby heritage assets such as assets associated with the Oxford Canal or Begbroke.

9.108. The proposal would not affect the significance of any designated heritage asset. No harm is identified for the purposes of the NPPF historic environment chapter.

9.109. The application is also supported by an Archaeological Desk-Based Assessment. The assessment identifies modest archaeological potential for later prehistoric and Roman remains, with any such remains likely to be of local significance. Parts of the site have also been affected by previous twentieth-century development, reducing archaeological potential in those areas. The south-western area proposed for development appears to have remained more open historically and therefore requires further investigation.

9.110. Oxfordshire County Council's archaeological advice at pre-application stage indicated that a staged programme of archaeological investigation could be secured by condition, beginning with trial trenching targeted on the areas of proposed development impact.

9.111. The Council therefore advises that any permission should require:

- a written scheme of investigation;
- archaeological trial trenching;
- further mitigation if required by the results;
- recording, analysis and publication;
- reporting to the Historic Environment Record; and

- no development in relevant areas until the agreed archaeological programme has been implemented.

9.112. Subject to this condition, the proposal is acceptable in heritage and archaeology terms.

Air quality, contamination, unexploded ordnance and waste

9.113. The application is supported by an Air Quality Assessment. The submitted Planning Statement identifies that modelled pollutant concentrations are below national air quality objectives and that air quality should not be a constraint on the development. Construction-phase mitigation is recommended and should be secured by condition.

9.114. The proposal would increase vehicle movements and construction traffic, but the scale of operational traffic increase is not such that it is expected to result in unacceptable air quality effects. The development also includes electric vehicle charging provision and travel planning measures.

9.115. Any permission should secure:

- construction dust mitigation;
- non-road mobile machinery controls where relevant;
- wheel washing and road cleaning;
- construction traffic management;
- electric vehicle charging provision;
- travel plan implementation; and
- monitoring if required by Environmental Health.

9.116. The application is supported by a Phase 1 Preliminary Risk Assessment for contamination. The submitted Planning Statement identifies that the site is not within an Environment Agency groundwater Source Protection Zone and that there are no licensed surface water abstractions within 1km. The qualitative risk assessment identifies moderate-low risk to human health, moderate risk to controlled waters, low risk from off-site sources and moderate risk from on-site and off-site ground gas sources. Further generic quantitative risk assessment and intrusive investigation are recommended.

9.117. Given the long-standing institutional use of the site and proposed sensitive accommodation use, contamination must be controlled through standard phased conditions. Any permission should require:

- site investigation;
- risk assessment;
- remediation strategy;
- verification report;
- unexpected contamination procedure;
- gas monitoring and protection measures where required; and
- controls to protect controlled waters.

9.118. An Unexploded Ordnance (UXO) report has also been submitted, and the submitted Planning Statement identifies that the semi-quantitative UXO risk assessment concludes that the risk is high and sets out a mitigation strategy. This must be treated seriously, particularly given the scale of groundworks proposed.

9.119. Any permission should require:

- compliance with the submitted UXO risk assessment;

- UXO mitigation strategy;
- appropriate site briefings;
- specialist UXO supervision where required;
- procedures for intrusive works; and
- integration with the Construction Environmental Management Plan.

9.120. A Waste Strategy has also been submitted. The final development should include details of construction waste management, operational waste storage, segregation, collection arrangements and secure waste handling. These matters can be controlled by condition.

9.121. Subject to these controls, the proposal is likely acceptable in relation to air quality, contamination, UXO and waste.

Airport safeguarding and operational safety

9.122. The site lies close to London Oxford Airport, so Airport safeguarding is therefore an important technical consideration.

9.123. The proposed development would include buildings up to 16 metres high, roof-mounted solar PV, solar car park canopies, external lighting, drainage infrastructure, new planting and construction cranes or other tall construction equipment. Each of these could have safeguarding implications, including in relation to obstacle limitation surfaces, glare, lighting, bird strike risk, construction crane activity and electronic or operational interference.

9.124. At outline stage, there is no reason to conclude that the proposal is unacceptable in airport safeguarding terms. The site is already developed and lies within an established built corridor close to the airport. However, detailed safeguarding matters must be resolved before development proceeds.

9.125. The Council advises that any permission should require:

- consultation with London Oxford Airport and any relevant aviation safeguarding body;
- final building heights and roof plant details;
- details of construction cranes and tall plant;
- crane operation plans if required;
- lighting design to avoid confusion with aeronautical lighting;
- solar PV glare and glint assessment;
- bird hazard management where relevant;
- species selection for landscaping to avoid increased bird strike risk;
- drainage design to avoid standing water that may attract birds; and
- construction management arrangements compatible with airport operations.

Subject to airport safeguarding controls and consultation, no objection is raised on this matter.

Health provision and on-site welfare

9.126. The proposal would increase the number of detained persons from 160 to up to 400. It is therefore necessary to consider whether the development would place unacceptable pressure on local health services and whether adequate on-site welfare provision is proposed.

9.127. The submitted material explains that the expanded IRC would include dedicated health care facilities, including primary care, GP and nurse clinics, enhanced first

response capability, dentistry and mental health services for staff and detained persons. Emergency care would be routed to John Radcliffe Hospital or Horton General Hospital only in exceptional cases. The stated purpose of this model is to minimise pressure on local NHS services by providing comprehensive care on site.

- 9.128. The submitted material also indicates that recreation and welfare facilities would be provided within the secure site, including the retained Multi-Use Games Area, informal recreation space, faith facilities, education space, fitness suites, TV rooms and cultural kitchens.
- 9.129. These matters are partly operational and partly planning-related. The planning concern is whether the expanded use would create external impacts or infrastructure demands that require mitigation. On the basis of the submitted material, it is reasonable to conclude that the development would provide a high degree of on-site provision and would not place unacceptable pressure on local community or health infrastructure.
- 9.130. The Secretary of State should nevertheless be satisfied that the Home Office's operational arrangements are sufficient and that any required health service engagement has taken place. If any NHS or local health consultee identifies a specific mitigation requirement that meets the statutory tests, that matter should be secured through an appropriate mechanism.

Community impact, public perception, fear of crime, human rights and equalities

- 9.131. The proposal is highly sensitive. It relates to the expansion of an Immigration Removal Centre and is likely to generate strong public concern. The planning system must distinguish between material land use impacts and wider objection to national immigration policy or the existence of immigration detention as a public function.
- 9.132. Public concern, fear of crime, community cohesion and perceived safety can be material planning considerations where there is an evidential basis for the concern and a sufficient planning link to the use of land. However, fear or opposition alone is not determinative. The question is whether the proposed development would be likely to cause unacceptable planning harm.
- 9.133. Campsfield is an existing secure residential institution where detained persons are not permitted to leave the site. The proposal would extend the secure operational use, including security fencing, controlled access, CCTV and staff presence. The submitted material identifies that security staff would provide a 24-hour presence, that access and egress would be controlled, and that the Home Office and site operator would liaise with police.
- 9.134. The submitted material also acknowledges the possibility of protests and heightened public concern. Previous protests at Campsfield are part of the site's history. Such protests are generally linked to national immigration policy and the operation of IRCs rather than to ordinary planning impacts. However, protest activity can affect local residents through noise, traffic, obstruction, fear of disorder and pressure on police resources. This is a legitimate matter to acknowledge.
- 9.135. The applicant states that the Home Office, in coordination with local police, would be responsible for managing any such events to maintain public order and community reassurance. The Council advises that the Secretary of State should give careful consideration to this matter and require an appropriate operational/community management framework.

9.136. Any permission should secure, so far as planning law properly allows:

- a site security management plan;
- a community liaison strategy;
- named contact arrangements for local residents and the Council;
- a complaints and incident reporting procedure;
- liaison arrangements with Thames Valley Police;
- protest/event management protocols where relevant to land use impacts;
- management of visitor arrivals and departures;
- car park and access management; and
- review arrangements following first occupation of the expanded facility.

9.137. Care must be taken not to impose conditions that regulate immigration policy, detention policy or matters outside planning control. However, conditions can properly manage land use impacts, access, traffic, noise, lighting, security infrastructure, community liaison and site management where necessary.

9.138. Human rights and equality duties are also relevant. The Secretary of State, as decision-maker, must comply with the Human Rights Act 1998 and the Equality Act 2010, including the Public Sector Equality Duty. Cherwell District Council must also have regard to those duties when forming its consultation response.

9.139. The proposal engages competing rights and interests. Nearby residents have rights to respect for private and family life and peaceful enjoyment of their homes. Detained persons have rights and welfare interests relating to the quality and suitability of accommodation. The wider public interest includes the provision of national immigration infrastructure and the proper operation of public services. The planning assessment must consider whether the land use impacts on residents and the local community would be disproportionate.

9.140. Subject to the mitigation identified in this report, officers consider that the planning impacts on local residents and the community would not be so severe as to justify an objection in this instance. The development would cause concern and some localised harm, but it would expand an existing secure facility and would be subject to operational security, management and planning controls.

Environmental Impact Assessment

9.141. The proposal has been subject to Environmental Impact Assessment screening through the Crown development process. The Secretary of State has previously considered whether the project is likely to have significant environmental effects. The submitted material includes extensive technical reports addressing the main environmental topics.

9.142. On the basis of the submitted material, the principal environmental effects are capable of being assessed through the application documents and controlled through conditions and obligations. The main residual effects relate to Green Belt, landscape and visual impact, construction disturbance, tree loss, ecological mitigation, traffic and community concern. These matters are addressed in this report.

9.143. If the Secretary of State has directed that the proposal is not EIA development, the Council does not need to object on EIA grounds. If the screening position changes, the Secretary of State will need to ensure that the statutory EIA process is followed before determining the application.

Planning obligations and mitigation

9.144. The submitted draft heads of terms indicate that planning obligations may be required in relation to Travel Plan measures including public transport and active travel contribution, and monitoring fees to Oxfordshire County Council.

9.145. Additional obligations or equivalent binding mechanisms are likely to be required for:

- off-site biodiversity net gain;
- biodiversity monitoring;
- travel plan monitoring;
- community liaison, if not capable of being secured by condition;
- public transport and active travel infrastructure;
- highway works where required; and
- legal and monitoring costs.

9.146. The Council advises that any obligations must satisfy the statutory tests. They must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

9.147. Given the Crown nature of the proposal, the Secretary of State and Home Office will need to confirm the appropriate mechanism for securing obligations, whether by section 106 agreement, unilateral undertaking, Grampian condition, Crown undertaking or other enforceable arrangement acceptable in law.

Technical conclusion

9.148. The technical planning issues are substantial but capable of being made acceptable.

9.149. The proposal would result in localised landscape and visual harm, tree loss, increased activity, construction disturbance and some adverse effects on nearby residents. Those matters weigh against the proposal. However, the site is an existing secure institutional use, the principal impacts are localised, and the submitted technical evidence indicates that the main effects can be mitigated through reserved matters, planning conditions and obligations.

9.150. Subject to the Secretary of State being satisfied on the Green Belt / Grey Belt and national need case, officers consider that the remaining technical matters do not justify an objection from Cherwell District Council. Planning obligations, conditions and securing mechanisms

9.151. The proposal is submitted under the Crown development procedure. Cherwell District Council is not the determining authority and is not itself issuing planning permission. However, the Council advises the Secretary of State that, if permission is granted, the development should be subject to appropriate conditions and any necessary legal obligation, Crown undertaking or other binding mechanism.

9.152. The conditions and obligations should be directed to the planning impacts of the development. They should not seek to control immigration policy, detention policy, detainee management or other matters outside the proper scope of planning control. However, it is appropriate to secure mitigation relating to Green Belt and landscape impact, design, ecology, biodiversity net gain, highways, travel planning, drainage, contamination, construction management, amenity, lighting, noise, security infrastructure, airport safeguarding and community liaison.

9.153. The application has been submitted in outline with all matters reserved except access. The detailed form of several conditions will need to reflect that procedural position. Some matters can be controlled before commencement, whereas other

matters should be controlled through reserved matters, phasing, pre-occupation requirements or post-completion verification.

- 9.154. The Council advises that permission should not be granted unless the Secretary of State is satisfied that all necessary mitigation can be secured in a legally effective and enforceable way.

Suggested planning obligations / legal undertaking matters

- 9.155. The following matters are likely to require a legal obligation, unilateral undertaking, Crown undertaking or equivalent binding mechanism:

1. Travel Plan implementation and monitoring

To secure implementation, monitoring, review and enforcement of the approved Travel Plan, including staff travel surveys and measures to promote sustainable travel.

2. Public transport and active travel contribution

To secure any contribution reasonably required by Oxfordshire County Council towards public transport and/or active travel measures directly related to the development.

3. Highway works / section 278 works

To secure any necessary works within the highway, including the proposed Langford Lane pedestrian crossing, footway improvements, signage, lighting, access improvements or other off-site highway works required by the Local Highway Authority.

4. Travel Plan monitoring fee

To secure any reasonable monitoring costs required by Oxfordshire County Council.

5. Off-site biodiversity net gain

To secure the required statutory 10% biodiversity net gain where this cannot be achieved fully on site, including off-site habitat units, long-term management and monitoring.

6. BNG / habitat monitoring

To secure monitoring, reporting and remediation if biodiversity net gain delivery fails to meet agreed targets.

7. Community liaison mechanism, if not secured by condition

To secure appropriate named contact arrangements, local liaison, complaint handling and reporting procedures relating to land use impacts, where such matters cannot be adequately secured by planning condition.

- 9.156. The final scope of obligations must satisfy the statutory tests. The obligations must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

Duty under The Equalities Act 2010

- 9.157. 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 do 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.

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

10. PLANNING BALANCE AND CONCLUSION

Planning balance

- 10.1. The proposal must be considered as a whole and in the context of the Crown development procedure. The Council is not the determining authority. Its role is to advise the Secretary of State, the Planning Inspectorate and the Home Office on the local planning merits of the proposal.
- 10.2. The development would provide a nationally important public infrastructure function. The Home Office has submitted a Statement of National Importance and supporting planning evidence explaining the operational need for additional immigration detention capacity. The Council is not responsible for determining immigration policy. The asserted national need and operational requirement must therefore be given significant weight, subject to the Secretary of State being satisfied that the Home Office evidence is robust.
- 10.3. The existing use of Campsfield as an Immigration Removal Centre is established. The proposal does not introduce a new use onto an unrelated site. It would expand and intensify an existing secure residential institution on a long-established, previously developed and operationally suitable site. That weighs significantly in favour of the development.
- 10.4. The proposal would also deliver economic benefits, including construction employment, increased operational employment and local expenditure. Sustainable construction measures, solar photovoltaic provision, biodiversity net gain and improved active travel infrastructure also weigh in favour of the development.
- 10.5. Against the proposal, the site is within the Oxford Green Belt. The development would introduce a substantial amount of new built floorspace, including a principal accommodation building of up to 16 metres in height. It would also increase car parking, security infrastructure, lighting, operational activity and the institutional presence of the site. This would cause harm to Green Belt openness, local landscape character and the perception of the gap between Kidlington and Begbroke.
- 10.6. The Green Belt harm is the main planning issue, and this matter is finely balanced. The site remains within the adopted Green Belt and Policy ESD14 applies. However, the established IRC compound has clear Green Belt characteristics. It is previously developed, visually contained, long established and part of a corridor already influenced by London Oxford Airport, Oxford Technology Park, commercial uses, residential properties and existing institutional development. It does not perform the same Green Belt function as the surrounding open fields.
- 10.7. The Council therefore considers that there is a credible basis for the Secretary of State to treat the developed Campsfield compound as Green Belt for the purposes of

the NPPF. If that approach is accepted, the proposal is not inappropriate development provided the relevant NPPF tests are met. Officers consider that those tests are capable of being met.

- 10.8. If the Secretary of State does not accept the Grey Belt case, the proposal would be inappropriate development in the Green Belt. In that scenario, very special circumstances would be required. Officers consider that the national need, the established lawful use, the use of an existing secure institutional site, the smaller scale compared with the 2014 proposal, the containment of the main development within the existing operational envelope, and the site's Grey Belt characteristics collectively amount to very special circumstances capable of clearly outweighing the harm to the Green Belt and other residual harm.
- 10.9. The remaining technical planning issues are substantial but capable of being made acceptable. Landscape and visual harm would be localised and can be mitigated through detailed design, layout and planting. Residential amenity impacts, including construction disturbance, noise, lighting and activity, can be controlled by conditions. Highways, parking and access matters are acceptable in principle, subject to Oxfordshire County Council's requirements, travel planning and highway mitigation. Ecology, protected species, HRA and BNG matters are capable of being addressed through conditions, licensing and off-site BNG provision. Drainage, foul water, contamination, UXO, archaeology, waste and airport safeguarding can also be controlled through conditions.
- 10.10. Public concern and community sensitivity are important and should not be understated. The Council recognises that the expansion of an IRC will generate strong views. However, the planning assessment must focus on land use impacts. The proposal would expand an existing secure facility, and the identified impacts are capable of mitigation. The Council should therefore not object on public perception grounds, but should request robust site management, community liaison and police liaison arrangements.
- 10.11. Overall, officers consider that the proposal is acceptable in planning terms, subject to the Secretary of State being satisfied on national need, Green Belt/Grey Belt and the securing of robust mitigation.

Conclusion

- 10.12. The proposal would result in significant expansion of Campsfield Immigration Removal Centre. It would increase the capacity of the facility from 160 to up to 400 detained persons and substantially increase the amount of built floorspace on the site.
- 10.13. The key issue is Green Belt harm. The proposal is finely balanced. It would cause harm to openness and would increase the visual and operational presence of the IRC within the Green Belt. However, the site is an established, developed and visually contained secure institutional compound. The development would largely intensify an existing use within the existing operational envelope. The site has clear Grey Belt characteristics and is materially different from undeveloped open countryside. The national need and operational case advanced by the Home Office carry substantial weight.
- 10.14. The Council should therefore advise the Secretary of State that it raises no objection to the proposal, subject to the Secretary of State being satisfied on the national need and Green Belt/Grey Belt case, and subject to conditions and obligations securing detailed design, mitigation, management and monitoring.

11. RECOMMENDATION

It is recommended that Cherwell District Council Planning Committee resolves to authorise officers to advise the Secretary of State, the Planning Inspectorate and the Home Office that Cherwell District Council raises no objection to Crown application CROWN/2026/0000004 / Cherwell reference 26/01402/CROWN, subject to:

1. The Secretary of State being satisfied that the submitted national need, operational need and security evidence justifies the proposed expansion of Campsfield Immigration Removal Centre;
2. The Secretary of State being satisfied that the proposal constitutes Grey Belt development which is not inappropriate development for the purposes of the National Planning Policy Framework, or, in the alternative, that very special circumstances exist which clearly outweigh the harm to the Green Belt and any other harm;
3. The development being controlled by planning conditions covering the matters set out in this report; and
4. Any necessary planning obligations, Crown undertaking or other binding mechanism being secured to address travel plan monitoring, public transport and active travel mitigation, off-site biodiversity net gain, highway works, monitoring and any other mitigation required to make the development acceptable in planning terms.

12.0 Suggested planning conditions

The following suggested conditions are not intended as final legal drafting. They identify the matters which Cherwell District Council considers should be secured if the Secretary of State grants planning permission.

1. Time limits and reserved matters

Condition: Details of layout, scale, appearance and landscaping shall be submitted to and approved by the Secretary of State/local planning authority, as appropriate, before the commencement of any development other than enabling works agreed in writing. Development shall be carried out in accordance with the approved reserved matters.

Reason: The application is submitted in outline with all matters reserved except access. Detailed control is required in the interests of Green Belt openness, landscape character, visual amenity, residential amenity, design quality, biodiversity, drainage and highway safety.

2. Reserved matters submission period

Condition: Applications for approval of reserved matters shall be made within the period specified by the Secretary of State.

Reason: To ensure that the outline permission is implemented within an appropriate period.

3. Commencement period

Condition: The development shall begin within the period specified by the Secretary of State following approval of the last reserved matter.

Reason: To comply with the statutory framework and ensure timely implementation.

4. Approved plans and documents

Condition: The development shall be carried out in accordance with the approved location plan, access plan, parameter plans and any other plans/documents expressly approved by the Secretary of State.

Reason: For certainty and to ensure the development remains within the assessed parameters.

5. Maximum capacity

Condition: The expanded Immigration Removal Centre shall not accommodate more than 400 detained persons at any time.

Reason: The planning impacts of the development, including Green Belt, traffic, parking, amenity, noise, lighting, drainage, servicing and operational impacts, have been assessed on the basis of a maximum capacity of 400 detained persons.

6. Maximum floorspace

Condition: The total gross internal floorspace of the expanded development shall not exceed the floorspace assessed in the application, unless otherwise approved through a subsequent planning permission.

Reason: To ensure that the scale of development remains within the assessed Green Belt, design, landscape, drainage, transport and amenity parameters.

7. Maximum building heights

Condition: No building shall exceed the maximum height parameters approved by the Secretary of State, including a maximum height of 16 metres for the principal accommodation building.

Reason: To protect Green Belt openness, local landscape character, visual amenity, airport safeguarding interests and residential amenity.

8. Use restriction

Condition: The site shall be used only as an Immigration Removal Centre within Use Class C2A and for ancillary operational purposes directly related to that use.

Reason: Other C2A uses or institutional uses may have materially different planning impacts and have not been assessed.

9. Phasing plan

Condition: No development shall commence until a phasing plan has been submitted and approved. The development shall be carried out in accordance with the approved phasing plan.

Reason: To ensure orderly delivery of development and mitigation.

10. Detailed design code / design parameters

Condition: Any reserved matters submission shall be accompanied by a design statement demonstrating compliance with the approved parameter plans and explaining how the development minimises visual and Green Belt impact.

Reason: To secure high-quality and context-sensitive design.

11. External materials

Condition: Details and samples of all external facing materials, roof materials, cladding, glazing, plant screening, rainwater goods, fencing finishes and hard surfacing shall be submitted and approved before installation.

Reason: To ensure a satisfactory appearance and reduce visual harm.

12. Finished floor levels and site levels

Condition: Details of existing and proposed ground levels, finished floor levels, bunding, retaining structures and earthworks shall be submitted and approved before relevant works commence.

Reason: To control visual impact, drainage, accessibility and relationship with surrounding land.

13. Boundary treatments and security fencing

Condition: Details of all boundary treatments, perimeter fencing, internal zonal fencing, gates, barriers, acoustic fencing, opaque fencing and CCTV infrastructure shall be submitted and approved before installation.

Reason: To control visual impact, security infrastructure, residential amenity, ecology and Green Belt openness.

14. Landscape scheme

Condition: A detailed hard and soft landscape scheme shall be submitted and approved before the relevant phase begins. The scheme shall include planting plans, species, sizes, densities, soil preparation, tree pits, aftercare, hard surfacing, street furniture and landscape phasing.

Reason: To mitigate visual and landscape harm, enhance biodiversity and soften the appearance of the development.

15. Landscape implementation

Condition: The approved landscape scheme shall be implemented in accordance with the approved timetable. Any tree, shrub or plant that dies, is removed, becomes seriously damaged or diseased within a specified establishment period shall be replaced.

Reason: To ensure effective landscape mitigation.

16. Landscape and Ecological Management Plan

Condition: A Landscape and Ecological Management Plan shall be submitted and approved before occupation of the expanded facility. It shall include long-term management objectives, maintenance operations, ecological enhancement, monitoring and remedial measures.

Reason: To secure long-term landscape and biodiversity benefits.

17. Tree protection

Condition: No development, demolition, site clearance or enabling works shall commence until an Arboricultural Method Statement and Tree Protection Plan have been submitted and approved. The approved tree protection measures shall be installed before works commence and retained for the duration of construction.

Reason: To protect retained trees and landscape features.

18. Arboricultural supervision

Condition: Works affecting retained trees or root protection areas shall be supervised by a suitably qualified arboricultural specialist in accordance with an approved supervision schedule.

Reason: To ensure retained trees are protected during construction.

19. Biodiversity gain plan

Condition: No development shall commence unless a Biodiversity Gain Plan has been submitted and approved in accordance with statutory biodiversity net gain requirements.

Reason: To secure the mandatory 10% biodiversity net gain.

20. Off-site biodiversity net gain

Condition: Where biodiversity net gain is provided off site, no development shall commence until the off-site provision has been legally secured, registered where required, and accompanied by a Habitat Management and Monitoring Plan.

Reason: To ensure biodiversity net gain is delivered and maintained for the required period.

21. Construction Environmental Management Plan — biodiversity

Condition: No development shall commence until a Construction Environmental Management Plan for biodiversity has been submitted and approved. It shall include precautionary working methods for protected and notable species, ecological supervision, vegetation clearance controls, pollution prevention and habitat protection.

Reason: To protect biodiversity during construction.

22. Protected species licensing

Condition: No works affecting any protected species or protected species habitat shall take place until all necessary licences have been obtained and copies provided to the relevant authority.

Reason: To ensure compliance with protected species legislation.

23. Badger mitigation

Condition: No works affecting the badger sett or associated habitat shall commence until a detailed badger mitigation strategy has been approved and any necessary Natural England licence has been obtained.

Reason: To safeguard protected species.

24. Reptile and amphibian mitigation

Condition: No clearance of suitable reptile or amphibian habitat shall take place until a mitigation and translocation strategy, where required, has been submitted and approved.

Reason: To safeguard protected and notable species.

25. Nesting birds

Condition: No vegetation clearance shall take place during the bird nesting season unless a suitably qualified ecologist has confirmed that no active nests are present.

Reason: To protect nesting birds.

26. Bat-sensitive lighting

Condition: No external lighting shall be installed until a bat-sensitive lighting strategy has been submitted and approved.

Reason: To protect bats and boundary habitats.

27. Detailed lighting scheme

Condition: No external operational lighting shall be installed until a detailed lighting scheme has been submitted and approved. The scheme shall include column heights, luminaire types, lux contours, vertical light spill, colour temperature, timing, dimming, shielding and post-installation verification.

Reason: To protect residential amenity, ecology, landscape character, Green Belt openness and airport safeguarding interests.

28. Construction lighting

Condition: Details of any temporary construction lighting shall be submitted and approved before installation.

Reason: To protect residential amenity, ecology and airport safeguarding interests.

29. Noise limits for fixed plant

Condition: Fixed plant and equipment shall not exceed noise limits to be agreed at the nearest noise-sensitive receptors.

Reason: To protect residential amenity.

30. Plant details

Condition: No fixed plant, ventilation equipment, generators or similar equipment shall be installed until details and acoustic assessment have been submitted and approved.

Reason: To protect residential amenity.

31. Generator testing

Condition: Standby generator testing shall take place only during approved hours and in accordance with an approved management protocol, except in emergencies.

Reason: To protect residential amenity.

32. Operational noise management plan

Condition: Before occupation of the expanded facility, an operational noise management plan shall be submitted and approved.

Reason: To manage operational noise from car parks, servicing, plant, visitors, staff and escort movements.

33. Construction Environmental Management Plan

Condition: No development shall commence until a Construction Environmental Management Plan has been submitted and approved. It shall include working hours, noise and vibration controls, dust mitigation, lighting, compound location, wheel washing, waste management, pollution prevention, resident liaison and complaints procedure.

Reason: To protect residential amenity, highway safety, ecology and the environment during construction.

34. Construction hours

Condition: Construction, demolition and site clearance shall take place only during approved hours, unless otherwise agreed in writing.

Reason: To protect residential amenity.

35. Construction Traffic Management Plan

Condition: No development shall commence until a Construction Traffic Management Plan has been submitted and approved. It shall include HGV routing, delivery hours, contractor parking, compound location, traffic marshals, pedestrian/cycle safety, wheel washing, road cleaning and communication with residents.

Reason: In the interests of highway safety and residential amenity.

36. Access works

Condition: The approved access arrangements and any required off-site highway works shall be completed before occupation of the expanded facility.

Reason: In the interests of highway safety and accessibility.

37. Langford Lane pedestrian crossing

Condition: The proposed pedestrian crossing and associated works on Langford Lane shall be delivered before occupation of the expanded facility, unless otherwise agreed with the Local Highway Authority.

Reason: To promote safe pedestrian access and sustainable travel.

38. Parking layout

Condition: No occupation of the expanded facility shall take place until the approved car, motorcycle, accessible, escort and visitor parking spaces have been laid out, surfaced, drained, marked and made available.

Reason: To ensure adequate and safe parking provision.

39. Parking retention

Condition: The approved parking areas shall be retained for parking and manoeuvring associated with the approved use and shall not be used for other purposes.

Reason: To ensure appropriate parking and servicing provision.

40. Cycle parking

Condition: Secure, covered and accessible cycle parking shall be provided before occupation of the expanded facility and retained thereafter.

Reason: To promote sustainable travel.

41. Electric vehicle charging

Condition: Electric vehicle charging infrastructure shall be provided in accordance with an approved scheme before occupation of the expanded facility.

Reason: To support low-emission transport.

42. Travel Plan

Condition: The development shall be operated in accordance with an approved Travel Plan, including monitoring, review and remedial measures.

Reason: To promote sustainable travel and reduce private car dependence.

43. Servicing and delivery management

Condition: A servicing and delivery management plan shall be submitted and approved before occupation.

Reason: To ensure safe and efficient operation of the site.

44. Surface water drainage

Condition: No development shall commence until a detailed surface water drainage scheme has been submitted and approved. The scheme shall include

infiltration testing, groundwater monitoring, attenuation, exceedance routes, water quality treatment, maintenance and phasing.

Reason: To prevent increased flood risk and secure sustainable drainage.

45. Drainage verification

Condition: No occupation shall take place until a drainage verification report has been submitted and approved.

Reason: To ensure the approved drainage scheme has been implemented.

46. Foul drainage

Condition: No occupation shall take place until foul drainage details, including capacity confirmation and any Thames Water infrastructure works, have been approved and implemented.

Reason: To ensure adequate foul drainage infrastructure.

47. Thames Water pumping station

Condition: No works affecting the Thames Water pumping station shall take place until details have been approved by Thames Water and the relevant authority.

Reason: To protect foul drainage infrastructure.

48. Contaminated land investigation

Condition: No development shall commence until a site investigation and risk assessment for contamination has been submitted and approved.

Reason: To protect human health, controlled waters and the environment.

49. Remediation strategy

Condition: Where contamination is identified, no development shall proceed beyond agreed stages until a remediation strategy has been submitted and approved.

Reason: To ensure contamination is properly remediated.

50. Verification report

Condition: No occupation shall take place until a contamination verification report has been submitted and approved.

Reason: To confirm remediation has been completed.

51. Unexpected contamination

Condition: If unexpected contamination is found, works shall cease in the affected area until an appropriate remediation strategy has been approved and implemented.

Reason: To protect human health and the environment.

52. Ground gas protection

Condition: Gas monitoring and protection measures shall be provided where required by the approved risk assessment.

Reason: To protect future users of the site.

53. Unexploded ordnance

Condition: No intrusive groundworks shall take place until a UXO mitigation strategy has been submitted and approved. Works shall be carried out in accordance with the approved strategy.

Reason: To manage unexploded ordnance risk.

54. Archaeology

Condition: No development shall commence in areas of archaeological interest until a written scheme of investigation has been submitted and approved. The approved programme of archaeological work shall then be implemented.

Reason: To record and safeguard archaeological remains.

55. Sustainability and energy

Condition: Details of sustainability measures, energy strategy, BREEAM Excellent delivery, low-carbon technologies and solar photovoltaic provision shall be submitted and approved before relevant works commence.

Reason: To secure sustainable construction and climate change mitigation.

56. Solar PV glare and glint

Condition: No solar photovoltaic panels or canopies shall be installed until a glare and glint assessment has been submitted and approved, including consideration of airport safeguarding and residential amenity.

Reason: To protect airport operations, highway safety and amenity.

57. Airport safeguarding

Condition: No development shall commence until airport safeguarding details have been submitted and approved, including building heights, construction cranes, lighting, landscaping, drainage and bird hazard management.

Reason: To safeguard London Oxford Airport operations.

58. Construction cranes and tall plant

Condition: No crane or tall construction plant shall be used unless details have first been submitted and approved in consultation with the relevant airport safeguarding authority.

Reason: To protect aviation safety.

59. Bird hazard management

Condition: Landscaping, drainage and waste management shall be designed and managed to avoid increasing bird strike risk to London Oxford Airport.

Reason: To protect aviation safety.

60. Waste management

Condition: Details of construction and operational waste management shall be submitted and approved before relevant works commence or occupation takes place.

Reason: To ensure appropriate waste storage, collection and management.

61. Community liaison strategy

Condition: Before commencement of development, a community liaison strategy shall be submitted and approved. It shall identify contact arrangements, communication methods, complaints procedures and liaison with local residents and relevant public bodies in relation to construction and operational land use impacts.

Reason: To manage local amenity impacts and provide clear communication with nearby residents.

62. Operational site management plan

Condition: Before occupation of the expanded facility, an operational site management plan shall be submitted and approved, covering visitor management, escort vehicle management, car park management, servicing, complaints, incident reporting and liaison arrangements insofar as those matters relate to planning impacts.

Reason: To manage the land use impacts of the expanded facility.

63. Restriction on external plant and storage

Condition: No external plant, storage containers, temporary buildings or other operational structures shall be installed outside the approved areas without prior approval.

Reason: To protect Green Belt openness, visual amenity and residential amenity.

64. Removal of temporary construction works

Condition: Temporary construction compounds, buildings, plant and haul roads shall be removed and land restored in accordance with an approved scheme following completion of construction.

Reason: To protect Green Belt openness and visual amenity.

65. Compliance with mitigation

Condition: The development shall be carried out in accordance with the mitigation measures identified in the approved technical reports, unless superseded by subsequently approved details.

Reason: To ensure delivery of the mitigation relied upon in the assessment of the proposal.

13.0 Recommended Response letter

*Planning Inspectorate
Crown Development Applications Team*

*Home Office
Crown Development Application: Campsfield Immigration Removal Centre*

Dear Sirs,

Crown Development Application: CROWN/2026/0000004

Cherwell District Council Reference: 26/01402/CROWN

**Campsfield House Immigration Removal Centre, Evenlode Crescent,
Kidlington**

Outline Application for Expansion of Campsfield Immigration Removal Centre

I write on behalf of Cherwell District Council in response to the above Crown development application.

The application was considered by the Council's Planning Committee on 23 July 2026. The Committee resolved to authorise officers to advise the Secretary of State, the Planning Inspectorate and the Home Office that Cherwell District Council raises no objection to the proposed development, subject to the matters set out in this letter and the accompanying committee report.

The Council understands that the application has been submitted by the Home Office under the Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025. The Council's response is therefore provided as the local planning authority's consultation response. The Council is not the determining authority and does not purport to grant or refuse planning permission.

The Council also understands that public representations are being made directly to the Planning Inspectorate/Home Office through the Crown development process. The Council's committee report therefore does not provide a summary of public representations received by the Council. It provides the Council's professional planning assessment of the proposal and identifies the matters which the Council considers the Secretary of State should take into account.

The Council has assessed the proposal against the development plan, the National Planning Policy Framework, Planning Practice Guidance, relevant supplementary planning documents, the site's planning history, the pre-application advice

previously given by the Council and the technical material submitted with the application.

The Council's position is that the proposal is finely balanced but acceptable in planning terms, subject to appropriate mitigation and controls.

The Council considers that the main planning issue is the effect of the proposal on the Oxford Green Belt. The development would result in substantial additional built floorspace, including a principal accommodation building of up to 16 metres in height. It would also increase car parking, security infrastructure, lighting and operational activity. The proposal would therefore cause harm to Green Belt openness and some harm to the perception of the gap between Kidlington and Begbroke.

However, the Council also considers that the site is materially different from undeveloped open Green Belt land. Campsfield is an established Immigration Removal Centre within Use Class C2A. The site is a long-established, developed and visually contained secure institutional compound. It contains existing buildings, hardstanding, car parking, security infrastructure, lighting and operational development. It is also experienced in the context of London Oxford Airport, Oxford Technology Park and the wider developed Langford Lane corridor.

The Council considers that the established Campsfield compound has clear Grey Belt characteristics for the purposes of the National Planning Policy Framework. It is previously developed land and does not strongly perform the Green Belt purposes in the same way as the surrounding open fields. The Council therefore considers that there is a credible basis for the Secretary of State to conclude that the proposal is not inappropriate development in Green Belt terms, provided the relevant NPPF Grey Belt tests are met.

If the Secretary of State does not accept the Grey Belt case, the Council considers that very special circumstances are capable of being demonstrated. The Council gives significant weight to the established lawful use of the site, the national and operational need case advanced by the Home Office, the use of an existing secure institutional site rather than an unrelated new site, the smaller scale of the proposal compared with the withdrawn 2014 scheme, the containment of the principal development within the existing operational envelope, and the ability to mitigate technical impacts through conditions and obligations.

The Council does not consider that the remaining technical planning matters justify an objection, subject to robust mitigation. Design, scale, layout and appearance can be controlled through reserved matters and parameter plans. Landscape and visual harm can be mitigated through detailed design and structural planting. Residential amenity impacts, including noise, lighting and construction disturbance, can be controlled by condition. Highway, access, parking and travel planning matters are acceptable in principle, subject to Oxfordshire County Council's requirements and the securing of any necessary mitigation. Ecology, protected species, Habitats Regulations and biodiversity net gain matters are capable of being addressed through conditions, licensing and off-site BNG provision. Drainage, foul water, contamination, unexploded ordnance, archaeology, waste and airport safeguarding can also be controlled by condition.

The Council recognises the sensitivity of the proposal and the likely level of public concern. Public perception, fear of crime and community impact are capable of being material planning considerations where linked to land use impacts. The Council therefore requests that the Secretary of State gives careful consideration

to community liaison, site management, police liaison and complaint handling arrangements. However, the Council does not consider that public concern alone provides a planning basis for objection, given that the proposal would expand an existing secure facility and the identified land use impacts are capable of mitigation.

Accordingly, Cherwell District Council raises no objection to the proposal, subject to the following:

5. The Secretary of State being satisfied that the submitted national need, operational need and security evidence justifies the proposed expansion of Campsfield Immigration Removal Centre.
6. The Secretary of State being satisfied that the proposal constitutes Grey Belt development which is not inappropriate development for the purposes of the National Planning Policy Framework, or, in the alternative, that very special circumstances exist which clearly outweigh the harm to the Green Belt and any other harm.
7. The imposition of planning conditions covering, as a minimum:
 - reserved matters;
 - approved plans and parameter plans;
 - maximum detained person capacity;
 - maximum floorspace;
 - maximum building heights;
 - use restriction;
 - phasing;
 - detailed design and materials;
 - site levels;
 - boundary treatments and security fencing;
 - landscaping;
 - tree protection;
 - landscape and ecological management;
 - biodiversity net gain;
 - protected species mitigation;
 - Habitats Regulations matters;
 - lighting;
 - noise and plant;
 - construction environmental management;
 - construction traffic management;
 - access and off-site highway works;
 - parking;
 - cycle parking;
 - electric vehicle charging;
 - travel planning;
 - servicing and delivery management;
 - surface water drainage;
 - foul drainage;
 - Thames Water infrastructure;

- contaminated land;
- unexploded ordnance;
- archaeology;
- sustainability and energy;
- solar PV glare and glint;
- airport safeguarding;
- waste management;
- community liaison;
- operational site management; and
- compliance with submitted mitigation.

8. The completion of any necessary section 106 agreement, unilateral undertaking, Crown undertaking or other binding mechanism to secure:

- Travel Plan implementation and monitoring;
- public transport and active travel mitigation;
- highway works and monitoring;
- off-site biodiversity net gain;
- BNG monitoring;
- any required community liaison mechanism; and
- reasonable monitoring and legal costs.

The Council's full committee report is enclosed with this response and should be read as part of the Council's consultation response.

Yours faithfully,

xxx

On behalf of CDC

CASE OFFICER: Rob Duckworth