



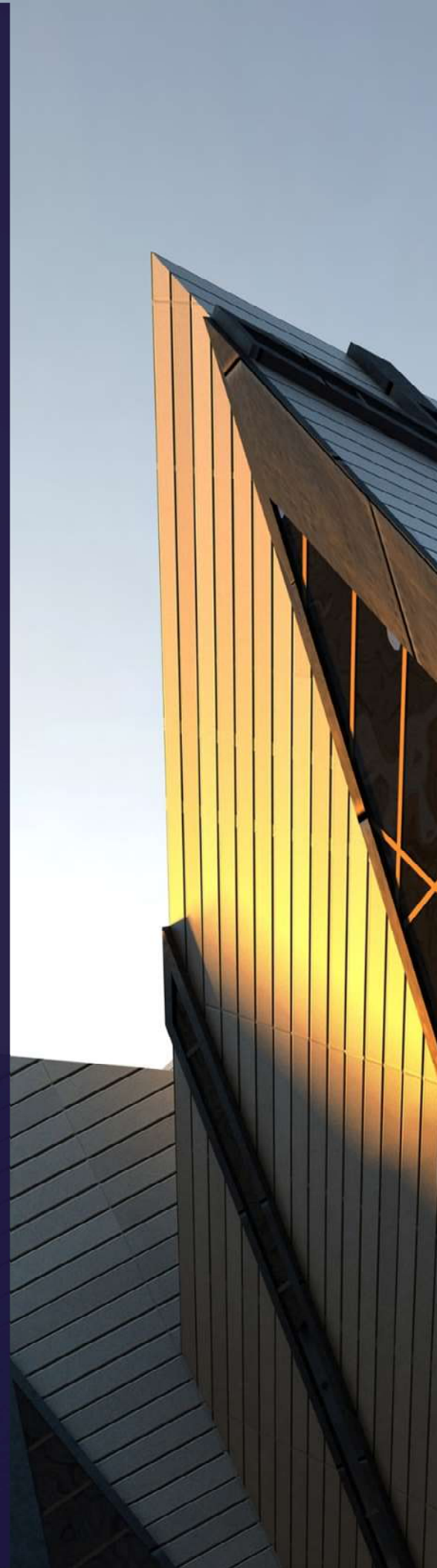
PLANNING STATEMENT

Campsfield IRC Extension
Home Office

DEVELOPMENT & PLANNING | BIRMINGHAM

April 2026

Better never settles



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1. Introduction

- 1.1 This Planning Statement has been prepared by Cushman & Wakefield (C&W) on behalf of the Home Office (HO) in support of an Outline Planning Application (OPA) with all matters reserved except access made under the Crown Development Route (CDR) for the expansion of the Campsfield Immigration Removal Centre (IRC) near Kidlington (hereafter referred to as the 'Site'), together with the necessary associated site infrastructure. A full description of development is set out in section two of this statement.

The Applicant

- 1.2 The HO ('the applicant') is the lead Government department for immigration and passports, drugs policy, crime, counterterrorism and police. Immigration Enforcement (IE) is the area of the Home Office responsible for preventing abuse of the immigration system, increasing compliance with immigration law, pursuing those here illegally and protecting the vulnerable. IE works with partners across law enforcement, wider government, the private sector, and the voluntary sector to achieve this.
- 1.3 The HO is responsible for the provision and management of Immigration Removal Centres (IRCs), which form part of IE's infrastructure. The proposed development is made in response to a need to expand IRC provision within the United Kingdom.

Supporting Documents

- 1.4 This Planning Statement should be read in conjunction with the accompanying plans submitted as part of the application, as well as the following documents, which have been prepared to address all the material planning considerations.
- 1.5 Plans submitted for approval:
- Site Location Plan
 - Existing Site Plan
 - Proposed Site Access Plan
 - Proposed Demolition Plan
 - Proposed Temporary to Permanent Buildings Plan
- 1.6 Plans for Information¹:
- Indicative Site Layout
 - Indicative Site Development Parameters
 - Indicative Elevations and Sections
 - Indicative Floor Plans and Roof Plans
 - Indicative Landscaping Plan
 - Indicative Lighting Plan
- 1.7 Documents (referred to in this Statement)
- Air Quality Assessment by Plowman Craven
 - Archaeological Desk Based Assessment by RPS Group

¹ These plans contain official sensitive information and are not submitted for approval or public consideration but to assist the decision maker in understanding the proposed development.

- Biodiversity Net Gain Assessment by Sweco
- Contaminated Land Assessment - Phase 1 Preliminary Risk Assessment by Curtins
- Design and Access Statement by Edgingtons Architects
- Detailed UXO Threat and Risk Assessment by Alpha Associates
- Ecological Impact Assessment by Sweco
- Environmental Impact Assessment (EIA) Screening Decision
- Energy Statement by MZA Consulting Engineers
- Flood Risk Assessment and Drainage Strategy by Curtins
- Habitat Regulation Assessment Screening Report by Sweco
- Landscape and Visual Impact Assessment by ASA Landscape Architects
- Lighting Strategy and Assessment by MZA Consulting Engineers
- Noise Impact Assessment by MZA Acoustics
- Transport Assessment and Travel Plan by Curtins
- Tree Survey and Arboricultural Impact Assessment by CBA Trees
- Statement of Community Engagement by Cushman & Wakefield
- Statement of National Importance by Home Office
- Waste Management Statement by Atkinsrealis

Structure of the Planning Statement

1.8 This report is structured as follows:

- Section 2 provides the background to the site and its context within the surrounding area and an overview of the planning history of the site, and the pre-application engagement process.
- Section 3 provides a summary of the development proposal.
- Section 4 sets out the relevant planning policy framework for the site.
- Section 5 explains the need for additional IRC accommodation
- Section 6 provides an assessment of the material planning considerations arising from the proposal.
- Section 7 presents our conclusions with respect to the proposals.

2 Background

- 2.1 This section describes the site and the immediate surrounding area, together with a summary of the relevant planning history and pre-application discussions that have taken place with Cherwell District Council, the Local Planning Authority ('the LPA').

The Site

- 2.2 The site is owned by the applicant and extends to 4.37 hectares and comprises the existing Campsfield IRC and associated operational land, which is located to the north of Kidlington and south of London Oxford Airport. The site is broadly level, as is the surrounding area. A plan of the site is shown below at figure 2.1.



Figure 2.1 Location Plan extract

- 2.3 The secure IRC complex is located to the south of the site. Surface level car parking is located immediately northeast of the IRC complex. An area of previously developed land lies between the IRC car park and the ambulance station. This land previously accommodated housing, which was demolished between 1981 and 1991 and only the existing roads remain. Most recently it has been used to accommodate vehicles associated with the refurbishment of the existing IRC.
- 2.4 The IRC complex comprises of several single and two storey buildings - predominantly brick built - although the majority have now been rendered as part of the refurbishment to improve the thermal

performance of the buildings. There are some prefabricated units, which provide secure accommodation and ancillary uses associated with the IRC. The IRC is accessed via a gatehouse to the north of the IRC complex site with surface level car parking provided in this location. There is also a Multi-Use Games Area (MUGA) to the west of the existing buildings beyond which is a field located within the IRC complex. A high-level security fence extends around the entire IRC with a service road running around the eastern, southern, and western boundaries. Most of the site is screened by mature trees.

- 2.5 There is one main access roads into the site, as well as an emergency access road (both named Evenlode Crescent) both of which are accessed via Langford Lane from the A4260. The eastern road provides access to an Ambulance Service base (outside of the application site) and the IRC. The western road provides emergency access to the IRC via the National Tactical Response Group (NTRG) site, which adjoins the IRC to the north. The western road is the only access for residential dwellings (located northwest of the IRC and outside the application site) and the NTRG facility.

The Surrounding Area

- 2.6 To the north of the proposal site is London Oxford Airport (north of Langford Lane). Land east of the site land is currently being developed for Oxford Technology Park, (planning application ref: 14/02067/PUT). The land south and west of the site is in agricultural use.
- 2.7 Beyond the site is a small area of woodland, northwest of the NTRG facility, as well as an area of open space immediately west of the residential properties on Evenlode Crescent. The woodland and open space and NTRG facility are within the ownership of the Ministry of Justice.
- 2.8 An agricultural field immediately adjacent to the west from the IRC forms part of the proposed Botley West Solar Farm. The proposal is for a new Solar Farm stretching approximately 1400 hectares within the administrative areas of West Oxfordshire, Cherwell and Vale of White Horse.
- 2.9 The village of Begbroke lies southwest from IRC and the land southwest of Begbroke is allocated for residential development including a primary school, community woodlands and new green space/park under Policy PR9 in the adopted Cherwell Local Plan.
- 2.10 Oxford United Football Club is proposed to move from Oxford to the 'triangle' site south of Kidlington and adjacent to Oxford Parkway Station. The proposed site is 4.8 km south of Campsfield.
- 2.11 The town centre of Kidlington is approximately 2km southeast of the site. There are public transport links on Langford Lane (B2063) within approximately 350 metres of the Site.

Site History

- 2.12 Campsfield House was built and used as a youth detention centre. It re-opened as an IRC in November 1993 (accommodating up to 280 detained persons), and this operation continued until the facility was closed in 2018. Following closure, the site was managed by security, and no other uses were operated from the site.
- 2.13 In planning terms, the sites extant use is Use Class C2A (secure residential institution).
- 2.14 The HO made the decision to re-open the former IRC in 2022 and, following extensive refurbishment works, the IRC reopened on 1st December 2025. In accordance with the findings of the Shaw Review in 2018, the operational capacity of the IRC post refurbishment was reduced to a maximum of 160 detained persons.

Site Planning History

- 2.15 The planning history of the site is summarised below in two sub-sections. Firstly, historic planning applications and decisions relating to development on the site prior to the closure of the IRC in 2018,

which includes a previous application to extend the IRC. Secondly, the planning applications relevant to the refurbishment and re-opening of the IRC in 2025.

Applications prior to 2018

- 2.16 A schedule of all planning applications at the site has been identified through a search of Cherwell District Council's (CDC) online planning records, and is summarised in Appendix A. These predominantly relate to minor alterations to the IRC for operational purposes.
- 2.17 The exception to this was the planning application for an extension to the IRC, which was submitted in 2014 (ref:14/01778/F). The 2014 extension proposal is very similar to the current proposed development and would have extended the capacity of the IRC to almost 600 detained persons (280 plus approximately 290).
- 2.18 The description of the development was *"to provide additional detainee accommodation, ancillary detainee and staff facilities, car parking, landscaping and internal fencing."* The planning application file shows a committee report (attached as appendix B) in which the Case Officer recommended approval of the application.
- 2.19 The application was withdrawn following a deferral of the decision by the Planning Committee. An objection issued by Leigh Day Solicitors (17th February 2015) raised significant legal flaws with the approach followed by officers and, specifically, the Case Officer's Report. By virtue of this objection, the LPA advised the applicant to withdraw the planning application. The application was withdrawn on 12th March 2015.
- 2.20 The applicant has given due consideration to the content of the objection to the 2014 planning application and provides within this application the evidence necessary to allow the determination of the Planning Application.

Applications for IRC Refurbishment

- 2.21 The refurbishment of the IRC required a range of works to bring the buildings up to modern standards and the design requirements set out within the Shaw Report. Whilst a significant amount of the work could be carried out utilising permitted development rights afforded to Operational Crown Land, some works required planning approval (planning permissions and prior approvals). Appendix C includes a table that summarises the works undertaken and the relevant applications or permitted development rights used.
- 2.22 Prior to work being undertaken, the HO requested an EIA Screening Direction from the Department for Levelling Up, Housing and Communities (DLUHC) for the refurbishment and extension of Campsfield IRC. A Screening Decision was issued on 31st May 2023, which confirmed the proposed development, including the refurbishment works, did not comprise EIA development. Updated EIA screening was submitted in 2025 and decision was issued on 12th August 2025, which confirmed the proposed development, including the refurbishment works, did not comprise EIA development.
- 2.23 Pre-application advice issued by CDC (Appendix D) on 5th December 2025 confirms that the refurbishment works are considered permitted development that complied with the relevant classes of Part 19 of Schedule 2 of the GPDO.
- 2.24 One retrospective planning application for the installation of additional lighting columns within the IRC car park (ref 26/00084/F) remains to be determined at the date of submission of this OPA.

Development Proposals near to the Application Site

- 2.25 The application site adjoins the Oxford Technology Park, which has recently been developed and there are several development proposals in the local area, which are relevant to understanding the context of the application site. It is important to evaluate how the proposed development will integrate into

the wider area. The following sub-section summarises significant development proposals within close proximity to the application site.

Oxford Technology Park

- 2.26 Oxford Technology Park (ref: 14/02067/OUT²) was granted outline planning permission in October 2016 for a “New build Technology Park comprising 40,362 sq. m. of office, research and development, laboratory, storage and ancillary space.” The site has been developed in phases from north to south. The final phase of the development received approval (ref: 23/00915/F³) in July 2023 with the proposed height of the buildings to the south of the site being 10m. A Site Layout Plan is shown below at figure 2.1. The IRC is located immediately west of the park and the most recent planning permission provides helpful context by indicating that development within the southernmost part of the technology park site, which lies within the Green Belt, is acceptable in planning terms.

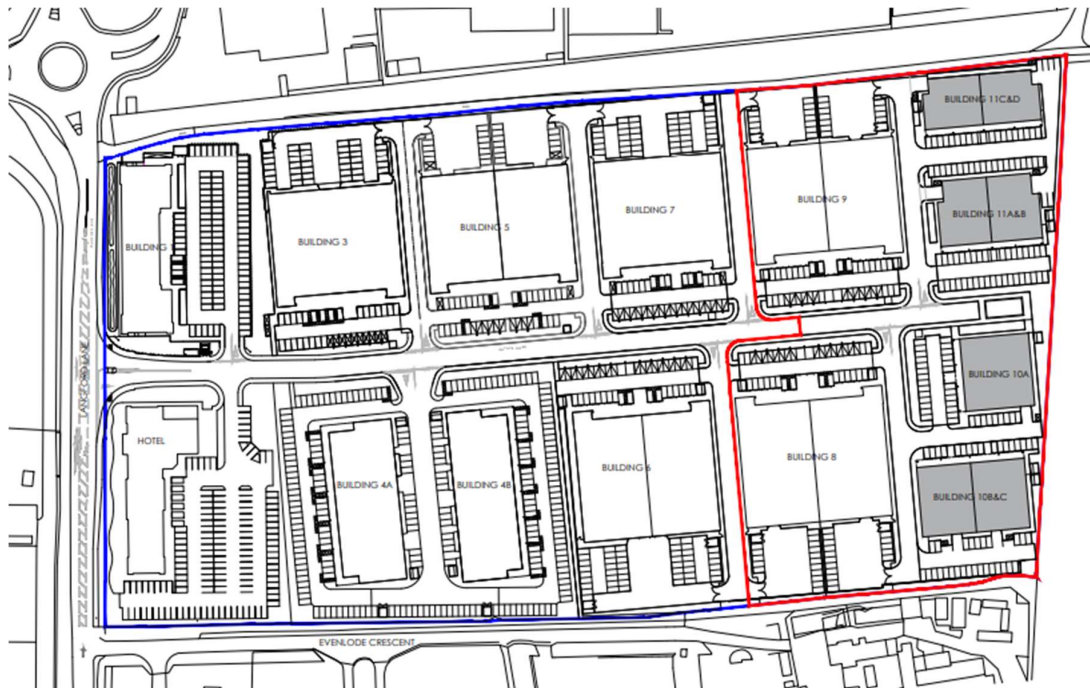


Figure 2.2. Oxford Technology Park Planning Permission

Oxford United Football Club New Stadium

- 2.27 Oxford United Football Club has agreed terms for a council-owned site that could be used to develop a new stadium for the club. The site is adjacent to Oxford Parkway and Kidlington, approximately 2.8 miles to the south of the application site.
- 2.28 Planning permission was granted on 26th February 2026 (ref: 24/00539/F⁴) for the Erection of a stadium (Use Class F2) with flexible commercial and community facilities and uses including for conferences,

² <https://planningregister.cherwell.gov.uk/Planning/Display/14/02067/OUT#undefined>

³ <https://planningregister.cherwell.gov.uk/Planning/Display/23/00915/F>

⁴ <https://planningregister.cherwell.gov.uk/Planning/Display/24/00539/F>

exhibitions, education, and other events, club shop, public restaurant, bar, health and wellbeing facility/clinic, and gym (Use Class E/Sui Generis), hotel (Use Class C1), external concourse/fan-zone, car and cycle parking, access and highway works, utilities, public realm, landscaping and all associated and ancillary works and structures.

Begbroke Science Park

2.29 Outline planning permission (ref: 23/02098/OUT⁵) was granted on 19th December 2025 for the development of Begbroke Science Park. The proposal will comprise of:

- 1.5ha Employment Uses (Classes B2, B8, E(g), and F1(a)) associated with the expansion of Begbroke Science Park
- 1,800 Residential dwellings (C3/C4/Sui Generis)
- Education facilities (Secondary School and up two Primary Schools)
- Hotel
- Retail (including the sale of food and drink)
- Non-residential and leisure institutions, including medical or health services, indoor sport or fitness facilities, and creches and/or nurseries.
- Halls and meeting places
- Sui generis uses including, but not limited to public houses, wine bars or drinking establishments
- Open outdoor recreation, play and sport space

2.30 The site lies to the south of Campsfield IRC.

2.31 The illustrative masterplan indicates the development will continue to maintain a green buffer in the form of parks around the edges of the proposal site with residential dwellings planned to the south and north and higher more substantial uses such as employment in the centre of the site.

2.32 The proposal aims to protect the setting of Yarnton, Begbroke and Kidlington by landscaped corridors with planting in strategic locations to screen and filter views. The proposed planting aims to filter/screen views of the Proposed Development.

2.33 Rowel Brook Park which will be the closest part of the proposal to Campsfield IRC aims to create a rural landscape that merges with existing natural features around the site boundary. This area is also proposed to incorporate allotments and agricultural land for community use.

2.34 The proposal will not introduce any sensitive uses closer to the IRC than presently exist. The illustrative masterplan is shown at figure 2.3.

⁵ <https://planningregister.cherwell.gov.uk/Planning/Display/23/02098/OUT>



Figure 2.4. Scheme Masterplan (Hawkings Brown)

Botley West Solar Farm

- 2.35 Botley West Solar Farm is proposed within the South Oxfordshire Countryside to deliver 840 MW energy to the National Grid, which would provide electricity to circa 330,000 homes. The central part of the site lies near Begbroke and Kidlington. The majority of the proposal is to the west of A44, excluding one site which lies partially adjacent to the west of Campsfield IRC. An indicative layout plan is shown at figure 2.4.
- 2.36 The application for a Development Consent Order (DCO) is currently with the Secretary of State for Energy Security and Net Zero with a recommendation having been made on 13th February 2026. It is anticipated a decision will be made in May 2026.

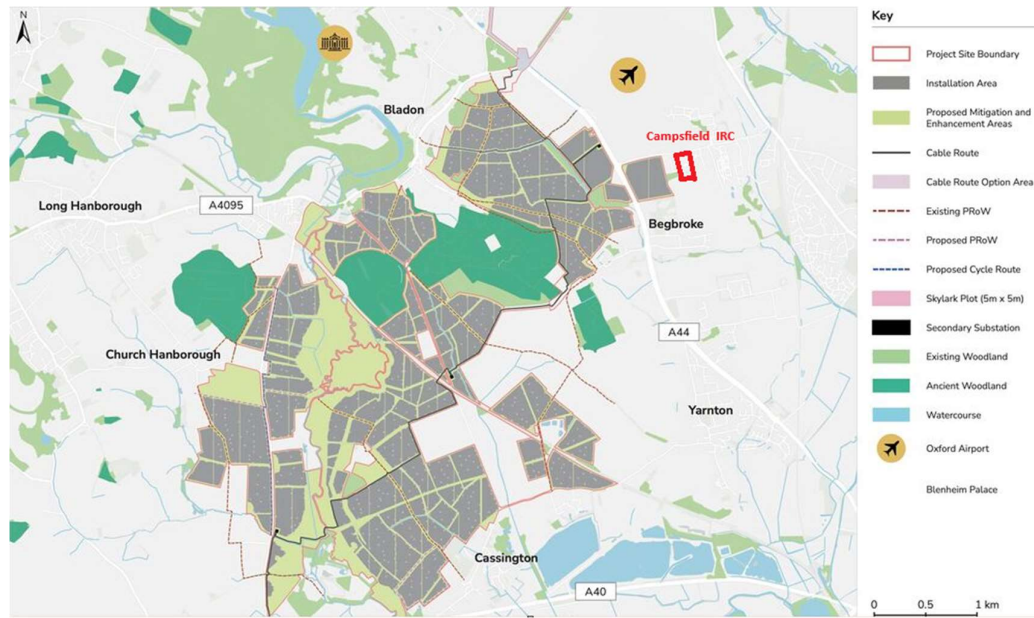


Figure 2.4. Indicative Solar Farm Layout

Pre-application Engagement

- 2.37 The HO has carried out extensive engagement with stakeholders (including the LPA, statutory consultees, national and local politicians and local residents).
- 2.38 A Statement of Community Engagement (SCE) is submitted with the application and sets out how the applicant has engaged with stakeholders about the proposed development. It summarises the process by which engagement has taken place, outlines the key meetings and discussions and the actions resulting from these. Specifically, where changes have been made to the proposal and, where changes have not been made, the reasoning behind the decision.
- 2.39 This sub-section focusses specifically on the pre-application discussions with the LPA (ref:25/02050/PREAPP) and summarises the key matters identified during the pre-application process. This Statement explains how each matter is addressed within section 5 – Planning Considerations.
- 2.40 The key planning matters identified by the LPA are:
- Extant Use/Baseline - The continued use of the site as an IRC is established. The question is whether additional built form and intensified use within the existing perimeter is acceptable in the Green Belt.
 - Principle of Development and Green Belt - Officers consider that some further intensification of use within the existing secure perimeter could, in principle, be justified, but this will be heavily dependent on the strength of the Very Special Circumstances (VSC) case and the extent to which harm to openness is minimised.
 - Grey Belt - There is a credible planning argument that the established Campsfield compound sits towards the “grey belt” end of the Green Belt spectrum, as does the surrounding open land. Any future application should still engage fully with Green Belt policy but can reasonably refer to these Grey Belt principles when discussing the modest intensification and expansion of the facility.
 - Landscape Impact - A landscape and visual appraisal with verified photomontages from agreed viewpoints would be required. Subject to a careful design approach, it is

considered that landscape and visual impacts could be reduced to a level that, while still harmful in Green Belt terms, may be acceptable in the overall balance, provided the VSC case, if required, is strong.

- On the current understanding of distances and intervisibility, significant direct heritage harm appears unlikely, but this should be confirmed through targeted assessment and visual analysis.
- Amenity - The main potential effects on residential amenity relate to noise from plant, external activity, alarms and traffic, light spill from security and circulation lighting, Perception of overlooking and loss of privacy.
- Construction - Any future application will need to explain and justify the proposed construction access strategy.
- Highway and Access - Given the existing lawful use and established access arrangements, and subject to appropriate mitigation and travel planning, it is likely that highway impacts could be made acceptable. Highway issues are unlikely to be the determining factor in the overall planning balance.
- Drainage - Drainage matters are considered capable of being addressed through an appropriate strategy and conditions.
- Ecology - With a well-designed green infrastructure and ecology package, there is scope to achieve meaningful ecological enhancements that will weigh positively in the planning balance.
- Airport Safeguarding – maximum building heights and crane heights should be agreed with the airport.
- Ground conditions and contamination - These matters are typically dealt with by condition and are unlikely, in themselves, to be determinative.
- Sustainable construction and climate change - Strong performance in this area will attract positive weight in the overall balance.

2.41 All planning matters discussed with the LPA, statutory consultees and key stakeholders are discussed within section 6 of this report.

3 The Proposed Development

3.1 The 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.”

3.2 Whilst detailed permission is not sought for the proposed site layout and internal floorspace, an indicative set of plans accompanies this application (for information) to demonstrate how the scale of development proposed can be accommodated on the site and to enable a robust assessment of impacts to inform the decision-making process.

3.3 The proposed development is explained in more detail below in the following sub-sections:

- Use
- Scale of Development
- Operation
- Security Arrangements

Use

3.4 The proposal is to extend the existing IRC together with additional site infrastructure to accommodate the operational requirements of the expanded facility. The existing and proposed use is Use Class C2A.

Scale of Development

3.5 The outline planning application does not proposed details of layout and scale for approval. However, the indicative layout and floor plans identify how the application site could accommodate the development requirements within the developable area of the site as shown on the indicative development parameters plan. Table 3.1 shows the existing operational capacity of the IRC and the operational capacity of the expanded IRC together with anticipated development parameters based upon operational requirements for the site.

	Existing IRC	Proposed IRC Extension
Number of detained persons (capacity)	160	Up to 240 (Up to 400 in total)
Staff (shift work pattern)	256	176 (432 in total)
Total Floorspace (sq. m. GIA)	5,790	Approximately 10,840 additional floorspace. Demolition of 292 temporary floorspace. Repurposing of 539 existing temporary floorspace. (16,337 in total for the expanded IRC)

Height of buildings (m)	9.4m (houseblock)	Up to 16m
Car/Cycle Parking	97 car spaces 4 motorcycle spaces	324 car spaces plus (including 57 for escort parking) 25% electric vehicle charging 17 motorcycle spaces 41 secure sheltered cycle spaces
Average Daily Vehicle Movement	Total: 592 two-way	Total: 392 two-way (984 in total)

- 3.6 The parameters of the proposed IRC extension are summarised below. The detailed scheme will not exceed the development heights shown. The floorspace detail may be subject to change and is provided for information only with this outline planning application.

Floorspace and Height

- Erection of Accommodation Blocks 9,708 sq. m. GIA (up to 16m)
- Care and Separation Unit (CASU) 210 sq. m GIA. (single storey up to 5.5m)
- Gate House 858 sq. m. GIA (two storeys up to 10m)
- Visitors' Reception 94 sq. m. GIA (single storey up to 5.5m)
- Escorts' Rest Area 180 sq. m GIA (single storey up to 5.5m)
- Modular Buildings 232 sq. m GIA (up to 5.5m).

Fencing

- 3.7 Installation of new fencing along the car park boundary will be up to 2m. Erection of internal zonal fencing within the IRC compound will be up to 5.2m. Any replacement security fencing will be up to 5.2m, as will vehicular and pedestrian gates into the IRC.

Car Parking

- 3.8 Creation of additional parking for staff and visitors (up to 324 spaces).

Landscaping (including Tree Planting / BNG)

- 3.9 The development will require the removal of trees and vegetation around the site (see indicative Site Plan). The applicant proposes to mitigate and enhance the site through the planting of replacement trees, vegetation and creation of biodiversity enhancements (see indicative Landscaping Plans).

Renewable Energy

- 3.10 Installation of solar PV panels above car parking, as shown on indicative roof plans and car park plans with PV panels proposed to be developed above car parking spaces.

Operation of the IRC

- 3.11 The expanded IRC will continue to operate 24 hours per day 365 days per year.
- 3.12 The site will be operated by a private service provider on behalf of the Home Office. Home Office compliance staff will be based on site to ensure all contractual obligations are being and continue to be met. Contracts cover all aspects of managing a safe and decent IRC, with specific focus on the welfare of those in the Home Office's care.

Staff and Shift Patterns

- 3.13 The anticipated total staff numbers for the site are 432. Employment will be variety of 24/7 cover in shift patterns and standard hours of work.
- 3.14 Staff will access the site through pedestrian access gates. It is anticipated that shift times will continue as existing and the peak traffic times for staff at the site will be between 7am-9am and 5pm-8pm.

Construction

- 3.15 Construction works are anticipated to take place between 0800 and 1700 Monday to Friday and will be managed through a Construction Management Plan (CMP) to be submitted for approval.
- 3.16 Construction traffic is estimated to be 3,360 HGV trips in total (i.e. 1,680 in and 1,680 out) over 18 months with an estimated peak of 20 per day over 20 weeks. Construction traffic movements for non-HGV vehicles will be up to 150 vehicles per day during the 18-month work programme.

Visitors

- 3.17 Visitors will access the site through dedicated pedestrian entrances. Visitors can arrive at the site at any time during visiting hours. Visiting hours are typically 9am – 9pm⁶, 7 days a week. Visitors will have dedicated parking spaces.
- 3.18 Using data from sites with a similar capacity, the approximate average amount of visitors expected daily is expected to be 10-15 persons. There is facility for virtual visits, reducing the need for visitors to travel to the site. Visitors will have to book their visit at least 24-hours in advance. This will provide the operator a degree of control, dictating how many people arrive and at what times, allowing for peak times to be avoided.

Arrivals and Departures of Detained Persons

- 3.19 All detained persons will be adult males. Detained persons will enter and leave the site in a vehicle. The only exception is when someone is being discharged and their family are collecting them. In this instance, they will leave through the pedestrian access.
- 3.20 There will be more arrivals than normal during the initial weeks after opening of the expanded facility whilst the site ramps up to capacity. The exact figures will be decided closer to the time and will be based on operational pressures and all pre-commencement activity being completed, but a working approximation would be 10 people arriving a day into the centre for the first 3-5 days, beyond this the movements would then increase to 15-20 people per day. Once the extended facility is fully operational, the average amount of vehicle arrivals with detained persons onboard will continue in line with existing operational practice. The numbers of detained persons on board will vary. This number of vehicles could be more during high-profile operations, in some instances coaches maybe used to

⁶ Social visits 2pm – 9pm

transfer detained persons. These instances will be the exception as opposed to the rule. Arrivals and discharges could take place at any time during a 24-hour period.

Lighting

- 3.21 There is existing lighting on site, which is not part of the lighting design. The lighting design for the proposal will employ measures to minimise light spill onto adjoining habitats and uses. All lighting on site will be LED lighting in line with existing provision.

Site Waste

- 3.22 An Outline Site Waste Management Strategy is submitted with the application to identify how waste streams can be minimised on site with reference to the current process on site.

On-site Healthcare

- 3.23 All detained individuals receive an initial healthcare screening within 2 hours of their arrival at an IRC. The healthcare team make an assessment from a medical perspective as to whether any detained individual's condition can be appropriately managed within the centre.
- 3.24 In addition to the above, as part of the risk assessment for those transferring from the prison estate, medical information is considered to ensure residents are allocated to most appropriate centre; and those detained from the community will be asked if they have any medical conditions as part of the risk assessment process before being allocated to an IRC.
- 3.25 Access to secondary care within the local area is an integral part of the healthcare service within the IRC. In relation to capacity issues within the local area, NHS England has allocated Integrated Care Boards (ICBs) to one of four 'segments'. A segmentation decision indicates the scale and general nature of support needs, from no specific support needs (segment 1) to a requirement for mandated intensive support (segment 4). The ICB is currently segmented as segment 3 – requiring some support.
- 3.26 According to the Health Needs Assessment for the proposed Campsfield IRC is estimated that planned outpatients appointments in secondary care represent 4.1% of the detained population profile and emergency escorts represented 1.1% of the detained population.

Security Arrangements

- 3.27 The site will be protected by physical and procedural security arrangements.
- 3.28 Physical security arrangements include, full CCTV coverage of the perimeter, 5.2m security graded fencing in accordance with HO standards, anti-climb measures, Perimeter Intruder Detection Systems (PIDS) and beam detection systems. All will aid in stopping residents accessing unauthorised areas, such as flat roofs and protected internal areas, and prevent escape.
- 3.29 The use of surveillance cameras will be in line with policy and all relevant legislation, including, but not limited to: Data Protection Act 1998, Regulation of Investigatory Powers Act 2000, Freedom of Information Act 2000, Human Rights Act 1998, and the Protection of Freedoms Act 2012.
- 3.30 The operating service provider will have a 24/7 presence on site to ensure the security arrangements laid out above, namely the contractually binding procedural security arrangements are completed. These arrangements can be tailored to any change in risk.
- 3.31 A Memorandum of Understanding will be drafted with Thames Valley Police during mobilisation and will confirm arrangements for managing protests and any visitors found to be in breach of any laws. The Home Office, in conjunction with the Police, will look to proactively engage with the protest groups to agree protest schedule.

4 Planning Policy Context

- 4.1 Section 38(6) Planning and Compulsory Purchase Act 2004 stipulates that in determining planning applications, determinations must be in accordance with the development plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for Cherwell Borough Council ('the Council') comprises:
- The Cherwell Local Plan 2011 – 2031 (Part 1) (adopted July 2015) (amended 2016 incorporating Policy Bicester 13 and amended 2020 incorporating Oxford's Unmet Housing Need)
 - Saved policies of the Adopted Cherwell Local Plan (1996)
- 4.3 Material considerations include the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG), relevant Supplementary Planning Documents (SPDs) and the Environment Act 2021 provisions on Biodiversity Net Gain (BNG).
- 4.4 The Council is preparing the Cherwell Local Plan Review 2042. The LPA noted within its pre-application advice that the *"Proposed Submission Plan carries **limited weight** at this stage but will, in time, replace elements of the current plan. It contains updated strategic policies on Green Belt, climate change, design and infrastructure, which will be relevant context for any future application."*

NATIONAL PLANNING POLICY FRAMEWORK (NPPF 2024)

- 4.5 The NPPF sets a presumption in favour of sustainable development and a positive approach to planning as a means of supporting the country's economic and housing growth, while protecting the environment. It directs local planning authorities to approve development proposals that accord with the development plan without delay.

Sustainable Development

- 4.6 Paragraph 8 of the NPPF advises that there are three dimensions to sustainable development economic, social and environmental, which are independent and need to be pursued in mutually supportive ways
- *"An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.*
 - *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - *an environmental objective – to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".*
- 4.7 Paragraph 11 of the National Planning Policy Framework establishes the presumption in favour of sustainable development, which underpins plan-making and decision-taking. It states that

“development proposals should be approved where they accord with an up-to-date development plan. Where relevant policies are out-of-date or absent, permission should be granted unless the adverse impacts would significantly and demonstrably outweigh the benefits, or specific policies in the Framework indicate that development should be restricted.”

Healthy and Safe Communities and Public Service Infrastructure

- 4.8 Paragraph 96 requires that planning decisions should aim to achieve healthy, inclusive and safe places, which among other things ensure the fear of crime does not undermine the quality of life or community cohesion.
- 4.9 Additionally, development should enable and support healthy lives by providing adequate sports facilities and meet local health needs.
- 4.10 Paragraph 101 of the NPPF states that *“to ensure faster delivery of other public service infrastructure such as criminal justice accommodation, local planning authorities should work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.”*
- 4.11 Paragraph 102 requires planning decisions to promote public safety and to take into consideration wider security requirements by recognising and supporting development required for security purposes.

Transport & Accessibility

- 4.12 Paragraph 109 sets out the overarching aim to ensure transport issues are considered from the earliest stages of plan-making and development proposals. This includes assessing the potential impacts on transport networks, opportunities to promote sustainable modes, and ensuring safe and suitable access for all users.
- 4.13 Paragraph 112 outlines that parking standards for non-residential development should consider *“the accessibility of the development, the type, mix and use of development, the availability of and opportunities for public transport, local car ownership levels; and the need to ensure an adequate provision of spaces for charging plug-in and other ultra- low emission vehicles.”*
- 4.14 In decision making, as per paragraph 115, it should be ensured *“appropriate opportunities to promote sustainable transport modes are prioritised taking account of the vision of the site; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision led approach.”*
- 4.15 Paragraph 116 states that *“development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road would be severe.”*
- 4.16 Finally, paragraph 117 encourages the provision of electric vehicle charging infrastructure.

Effective Use of Land

- 4.17 Paragraph 124 encourages the accommodation of *“objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land.”*
- 4.18 Paragraph 125 states decisions should *“promote and support the development of under-utilised land and buildings.”*

Design Quality and Amenity

- 4.19 Paragraph 135 states that planning decisions should ensure that developments:
- “a) will function well and add to the overall quality of the area.*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”*
- 4.20 Paragraph 136 notes the importance of trees in new developments, encouraging the integration of green infrastructure to enhance environmental quality and biodiversity.
- 4.21 Paragraphs 139 states that developments that are not well-designed should be refused, especially where they fail to reflect local design policies. Significant weight should be given to proposals that raise design standards or demonstrate innovation and sustainability.

Green Belt

- 4.22 Paragraph 142 reaffirms the Government’s commitment to safeguarding the Green Belt, highlighting its fundamental aim: to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belt are its openness and permanence.
- 4.23 Paragraph 153 outlines the five purposes served by the Green Belt, including preventing encroachment into the countryside and encouraging the recycling of derelict and urban land. These purposes underpin decisions on development proposals within Green Belt areas.
- 4.24 Paragraph 155 states that development may be regarded as not inappropriate in the Green Belt where all of the following apply:
- Development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (i.e. Cherwell District Local Plan).
 - There is demonstrable unmet need for the type of development proposed.
 - Development is in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF⁷.

Climate Change & Flooding

- 4.25 Paragraph 161 sets the overarching expectation that the planning system should *“help shape places that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”*
- 4.26 Paragraph 166 requires new development to:

⁷ Grey Belt definition contained in NPPF Glossary

“a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”

- 4.27 Paragraph 170 seeks development in areas at risk of flooding should be avoided by steering it to areas of lowest risk. Where development is necessary in flood-prone areas, it must be safe for its lifetime and not increase flood risk elsewhere.
- 4.28 Paragraph 181 requires planning applications to demonstrate that flood risk is not increased elsewhere. Development should place the most vulnerable uses in the lowest-risk areas, be flood-resistant and resilient, include sustainable drainage systems (SuDS), manage residual risk, and provide safe access and escape routes.
- 4.29 Paragraph 182 asks applications affecting site drainage must include SuDS that control runoff and offer multifunctional benefits such as improved water quality, biodiversity, and amenity. For major developments, SuDS must meet operational standards, include maintenance arrangements, and reflect advice from the Lead Local Flood Authority.

Natural Environment and Biodiversity

- 4.30 Paragraph 187 outlines that planning policies and decisions should contribute to and enhance the natural and local environment. This includes protecting valued landscapes, recognising the intrinsic character and beauty of the countryside, and preventing pollution and land instability. Development should aim to improve local environmental conditions, such as air and water quality.
- 4.31 Paragraphs 192–195 focus on biodiversity. Planning should promote the conservation, restoration, and enhancement of priority habitats and ecological networks. They identify specific protection areas noting that the presumption in favour of sustainable development does not apply where the proposal is likely to have a significant effect on a habitats site.
- 4.32 Paragraphs 179–180 require planning authorities to take a strategic approach to maintaining and enhancing green infrastructure and to plan positively for the creation, protection, and management of networks of biodiversity and green spaces.

Ground Conditions and Pollution

- 4.33 Paragraph 196 states that “planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.”
- 4.34 Paragraph 198 states that “planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
 - c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

CHERWELL LOCAL PLAN 2011 - 2031⁸

4.35 The table below identifies the relevant policies to the determination of the proposed development and summarises the key requirements of each policy.

Policy Reference	Purpose and Requirements
Policy PSD 1: 'Presumption in Favour of Sustainable Development'	Establishes the presumption in favour of sustainable development contained in the NPPF.
Policy SLE 4: 'Improved Transport Connections'	Requires new development to promote sustainable transport modes and make the fullest possible use of public transport, walking and cycling.
Policy ESD 1: 'Mitigating and Adapting to Climate Change'	<p>Requires mitigation of development on climate change through the incorporation of suitable adaptation measures in new development taking into account the known physical and environmental constraints when identifying locations for development.</p> <p>Requires demonstration of design approaches that are resilient to climate change impacts including the use of passive solar design for heating and cooling.</p> <p>Requires minimising the risk of flooding and making use of sustainable drainage methods and Reducing the effects of development on the microclimate.</p>
Policy ESD 2: 'Energy Hierarchy and Allowable Solutions'	Establishes the renewable hierarchy - reduction in energy use, supplying energy efficiently, making use of renewable energy and making use allowable solutions.
Policy ESD 3: 'Sustainable Construction'	Establishes requirements including water efficiency and minimum BREEAM standard (Very Good).
Policy ESD 4: 'Decentralised Energy Systems'	Encourages the use of decentralised energy systems in all new developments requiring a feasibility assessment for all applications for non-domestic developments above 1,000 sq. m. floorspace.
Policy ESD 5: 'Renewable Energy'	Establishes a requirement for a feasibility assessment of the potential for significant on-site renewable energy provision for all non – domestic development above 1000 sq. m. floorspace.

⁸<https://www.cherwell.gov.uk/info/83/local-plans/376/adopted-cherwell-local-plan-2011-2031-part-1>

Policy ESD 6: 'Sustainable Flood Risk Management'	Requires site specific flood risk assessments to accompany development proposals over 1ha.
Policy ESD7: 'Sustainable Drainage Systems SuDS'	Requires all new development to use sustainable drainage systems (SuDS) for the management of surface water run – off.
Policy ESD 10: 'Protection and Enhancement of Biodiversity and the Natural Environment'	Requires a net gain in biodiversity, protection of trees, and reuse of soil, incorporation of features to encourage biodiversity. Requires habitat surveys where protected species are affected. Requires air quality assessments where there is potential to have an adverse impact on the biodiversity.
Policy ESD14: Oxford Green Belt'	States that proposals within the Green Belt will be assessed in accordance with NPPF and NPPG. 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.
Policy ESD 15 The Character of the Built and Historic Environment	Establishes requirements for new development where the built and historic environment are relevant.
Policy Kidlington 1 (refer also to Green Belt)	Confirms a small-scale local review of the Green Belt will be undertaken to accommodate identified high value employment needs at two distinct and separate locations" and sets out the specific requirement for design and place shaping.
Policy INF 'Infrastructure' 1	Establishes that the Council will work with partners, including the central Government, to provide physical, community and green infrastructure. Development proposals will have to show that infrastructure requirements can be met.

SAVED POLICIES OF THE ADOPTED LOCAL PLAN 1996

4.36 The table below identifies the relevant to the determination of the proposed development and summarises the key requirements of each policy.

Policy Reference	Purpose and Requirements
<i>C15 – Prevention of coalescence of settlements</i>	<p>Confirms the importance of preventing coalescence of settlements by preventing development in areas of open land, which are important in distinguishing them.</p> <p>It identifies more vulnerable gaps and villages separated by small stretches of open land. The application site area is not mentioned in any examples.</p>

Policy C28 - 'Layout, design and external appearance of new development'	Requires layout, design and external appearance is sympathetic to the character of the area.
Policy - C31	Seeks to prevent incompatible non-residential uses in residential areas. Whilst highlighted in pre-application advice, this policy is not considered relevant given the proposed development is an extension to an existing C2A use within an area with a variety of uses.
Policy ENV1 - 'Development likely to cause detrimental levels of pollution '	Development which will cause materially detrimental noise, vibration, smell smoke or other environmental pollution will not be permitted.
Policy ENV12 'Contaminated Land'	Requires adequate measures to be taken to remove the threat of contamination, confirmation development is not likely to result in contamination of underground or surface water resources.

DEVELOPER CONTRIBUTIONS SPD (JULY 2018)

- 4.37 The SPD outlines the Council's strategy for securing contributions towards the infrastructure needed to support development, including transport, education, and community facilities and services.

KIDLINGTON MASTERPLAN SPD

- 4.38 The SPD provides detailed planning guidance to support the Cherwell Local Plan 2011–2031 (Part 1), focusing on Kidlington and its surrounding parishes. It aims to guide sustainable development, including small-scale housing growth, Village Centre expansion, and employment development. The Framework covers Kidlington, Gosford and Water Eaton, and parts of Yarnton and Begbroke, with particular attention to the urban area and employment hubs around Langford Lane, London Oxford Airport, and Begbroke Science Park.
- 4.39 Six core themes structure the Framework: revealing Kidlington's identity, creating a sustainable community, strengthening the Village Centre, supporting community needs, enabling economic success, and improving integration and connectivity. Each theme identifies objectives and opportunities for development, environmental enhancement, and infrastructure investment. The Framework promotes high-quality design, better use of land, and improved access to green spaces and heritage assets, including the Oxford Canal and River Cherwell corridors.
- 4.40 Campsfield IRC is not identified in the Masterplan but falls within the area for growth focused on employment growth. Employment growth is supported through a coordinated strategy for high-value sectors such as advanced manufacturing and scientific R&D. The Framework encourages integration between employment areas and the village, with improved transport links, business support, and public realm enhancements. Connectivity proposals include transforming Oxford Road into a pedestrian-friendly street, enhancing cycle and walking routes, and exploring new bus and rail connections.

5 The Need for Additional IRC Accommodation

Legislative Framework

- 5.1 The powers to detain for immigration purposes derive from the Immigration Act 1971, the Nationality, Immigration and Asylum Act 2002, the UK Borders Act 2007 and the Immigration (European Economic Area) Regulations 2016. Section 12 of the Illegal Migration Act 2023 provides that detention may only be for such period as is considered reasonable in order to enable the specific statutory purpose of detention to be carried out (for example, to enable examination, removal or deportation to be affected). It is open to detained individuals to apply for release on immigration bail, either to the Secretary of State or the Immigration and Asylum Chamber. It is also open to detained individuals to challenge the legality of their detention in the courts by way of a writ of habeas corpus or Judicial Review.
- 5.2 The legislative framework for the management and operation of IRCs is set out in Part VIII (sections 147 to 153) of the Immigration and Asylum Act 1999 and in the Detention Centre Rules 2001 (Statutory Instrument 2001/238). Section 147 of the 1999 Act was amended by section 66 of the Nationality, Immigration and Asylum Act 2002 (which changed the name from “detention centres” to “removal centres”). Paragraph 18(1) of Schedule 2 to the Immigration Act 1971 states that individuals may only be detained “in such places as the Secretary of State may direct”. This requirement is met via the Immigration (Places of Detention) Direction which must be updated before any new immigration removal centre opens to add the name of the centre to the document. The current version is the Immigration (Places of Detention) Direction 2025.⁹

The Purpose of Detention

- 5.3 Detention plays a key role in maintaining effective immigration controls and securing the UK’s borders, particularly in connection with the removal of people who have no right to remain in the UK, but who refuse to leave voluntarily.
- 5.4 IRCs provide a secure and humane environment for detaining foreign nationals who are subject to immigration control and are awaiting removal from the United Kingdom. Individuals are detained in IRCs to facilitate their removal from the UK. People who may be detained include those who have reached the end of a custodial sentence and are awaiting deportation as well as those who have no legal right to remain in the UK. The use of detention is governed by statutory requirements and published Home Office detention policy, which emphasises that detention should only be used when necessary and for the shortest period possible.

Demand

- 5.5 Current demand for immigration detention capacity vastly outstrips supply. Small boats are just one source of irregular migration. In 2023, over 29,400 people arrived irregularly in the UK, rising to more than 36,800 in 2024 via this route. For 2025, there were over 41,400 arrivals, the highest number since 2022. Both the Prime Minister and the Home Secretary have confirmed that tackling irregular migration remains a top government priority.
- 5.6 The challenge of irregular migration is reflected in recent international statements. On 9 September 2025, the Five Eyes partners issued a joint statement reaffirming their shared commitment to a set of common principles on returns. This reflects growing international concern around the rise in regular, irregular, and illegal migration, which presents a complex set of challenges for origin, transit, and

⁹ <https://www.gov.uk/government/publications/immigration-places-of-detention-direction-2021>

- destination countries. These pressures are placing increasing strain on the capacity and integrity of immigration systems globally.
- 5.7 In parallel with international efforts, the UK Government has demonstrated continued political focus on enforced returns. This is reflected in two key public statements which together illustrate both the operational intensity and the wider policy direction. The first is the Prime Minister’s statement of 31 March 2025, which set out the scale of immigration enforcement activity, noting that more than 48,000 people had been returned since the last election, including 36,600 returns in the 12 months to the end of October 2025, representing a 10% increase on the same period in the previous year. This announcement primarily focused on operational delivery and the escalation of enforcement activity.
- 5.8 Separately, the Government’s asylum and returns policy statement, *Restoring Order and Control*, set out the broader strategic framework for reforming the asylum system, strengthening returns policy and reducing irregular migration.¹⁰
- 5.9 On 19 October 2025, a record single flight of illegal migrants was returned under the UK-France agreement. The Home Secretary pledged to further scale up removals to France, stating: *“This is just the beginning. I will scale up these removals to France, and I will do whatever it takes to secure our borders.”* This momentum underscores the sustained political interest in enforced returns and the operational capacity required to support them.
- 5.10 The continued arrival of small boats and the sustained pressure on prison capacity underscore the urgent need to expand the detention estate, enabling increased removals and alleviating this strain.
- 5.11 Additionally, detention is used for effecting the deportation of Foreign National Offenders. Time-served Foreign National Offenders (TSFNOs) awaiting deportation are transferred to an IRC at the end of their prison sentence if they can be returned within a reasonable period and present a risk of absconding, and harm to the public. Changes following the Sentencing Review may result in more Foreign National Offenders being given suspended sentences rather than immediate custodial sentences reducing the volume of TSFNOs transferring from Prisons to IRC. Given the ongoing demand associated with the return of Foreign National Offenders (FNOs), together with wider changes arising from sentencing reform, there is a sustained and increased requirement for detention capacity. This demand represents a material and structural pressure on the detention estate, necessitating additional capacity to ensure the system can continue to operate effectively.
- 5.12 Demand for immigration detention capacity continues to exceed available supply at a national level. While the detention estate has been expanded in recent years, capacity has not kept pace with changing operational demands, including the increased focus on enforced returns of Foreign National Offenders and the impacts of sentencing reform.
- 5.13 Recent ministerial statements have confirmed Government approval for a significant expansion of detention capacity, including up to 1,000 additional beds at Campsfield and Haslar. This publicly endorsed programme reflects the sustained level of demand across the detention estate and the recognised need to increase capacity to support immigration enforcement priorities.
- 5.14 This sustained pressure on the detention estate demonstrates the need for additional, modern Immigration Removal Centre accommodation. The proposed development at Campsfield IRC forms part of this wider, Government-approved response and will make a meaningful contribution towards

¹⁰ <https://www.gov.uk/government/publications/asylum-and-returns-policy-statement/restoring-order-and-control-a-statement-on-the-governments-asylum-and-returns-policy>

addressing capacity constraints, improving resilience across the estate and supporting the Government’s priorities for immigration enforcement and public safety.

- 5.15 This shortfall demonstrates the urgent need for additional IRC accommodation to meet projected demand, maintain resilience and support the Government’s priorities for immigration enforcement and public safety.

Existing and Proposed Supply

- 5.16 The immigration removal estate is kept under review to ensure that the Home Office has sufficient resilience, geographical footprint and capacity for those men and women it is necessary to detain for the purposes of removal, while providing value for money.
- 5.17 Demand for detention beds has grown precipitously over recent years, reinforcing the need for a robust and responsive detention infrastructure. As such, the Home Secretary’s current priorities include reducing small boat arrivals, ending the use of hotels for asylum accommodation, implementing FNO sentencing reforms, and expanding enforced returns. Ministers have set ambitious targets for removals, but limited detention space remains a critical bottleneck.
- 5.18 At present, the existing estate has a capacity of 2,643 beds, including eight immigration removal centres, three Residential Short-Term Holding Facilities (RSTHF), one Residential Holding Room and one Pre-Departure Accommodation unit, supplemented by around 100 beds within the prison estate, (summarised in table 5.1). Operationally available capacity is lower than the headline figure due to constraints such as single-sex facilities, isolation requirements, maintenance downtime, and contingency headroom for surge events. Current modelling indicates that, after accounting for these factors, effective capacity is closer to c2,300 beds. The need for additional provision is to meet projected demand and maintain resilience.

Table 5.1 – Existing Detention Estate Total Capacity

Home Office Detention Estate	Capacity
Dungavel	150
Tinsley House	198
Brook House	426
Yarl’s Wood	434
Campsfield	160
Derwentside	84
Colnbrook	339
Harmondsworth	754
Swinderby (RSTHF)	37

Manchester (RSTHF)	32
Larne (RSTHF)	19
Total	2,633

- 5.19 The Home Office is increasing detention spaces to support a higher level of removals.
- 5.20 The case for change was motivated by successive prime ministerial commitments and new legislation. Following the change in Government in July 2024, the case for change remains one motivated by a prime ministerial commitment: most significantly, to increase removal volumes of those with no legal right to remain in the UK, including Time-Served Foreign National Offenders (TSFNOs).
- 5.21 The Immigration Removal Centre Expansion Programme’s (IRCEP) expansion of the immigration detention estate will enable the Government to enforce the removal of more individuals without leave to remain in the UK, further protect the public, and make our streets safer by removing more TSFNOs.
- 5.22 The requirement for additional IRC accommodation is determined by measuring case flows. Case flows refer to the movement of individuals through the immigration enforcement process - from arrival, through detention, to removal or release. It captures the volume and timing of cases entering and exiting the system, which directly impacts bed demand. It is influenced by the following factors:
- Expected arrivals.
 - Average length of stay.
 - Throughput rates (how quickly cases progress to removal).
 - Surge contingencies for peak periods.
- 5.23 Case flows are the core input for capacity modelling. Higher case flows (more arrivals or slower processing) increase the number of beds needed at any given time.
- 5.24 The demand model converts projected case flows into required detention capacity through a structured set of assumptions. It includes the following:
- The population of interest, which is the current number of people who are in the UK without immigration status and are of interest to IE.
 - Returns history – how many people are typically returned from the current estate, including assumptions on key metrics, like average bed nights detained and returns percentage.
 - Assumptions around how the overall demand is expected to change because of policy changes and other factors (for example, the returns agreement with France and the recent Sentencing Act).
- 5.25 A detention rate is then applied to estimate the proportion of arrivals who may be suitable for immigration detention, rather than alternative measures. The requirement represents an optimal figure (or range) of capacity where the Home Office ensures removal of irregular migrants increases significantly and this balances with legal constraints and value for money considerations. This approach provides an evidence-based mechanism for determining Immigration Removal Centre requirements and supports strategic planning for enforcement and removal objectives.

- 5.26 The strategy is to increase capacity to 3,500 by 2030. IE has been tasked to deliver an additional 1,000 detention bed spaces¹¹ to meet this ambition, some of which have already been delivered. IRCEP will be central to the Government’s missions, “Strong Foundations: Secure Borders” and “Safer Streets”, by supporting the Home Office’s ambitions to increase the removal rates of those here unlawfully over time and strengthen public safety. It will also help address the need to manage the immigration detention estate and maintain capacity while wider detention facilities are, where required, being refurbished or improved.
- 5.27 The expansion of Campsfield IRC is essential to meeting this need. Like other Immigration Removal Centres, Campsfield IRC will accommodate a mixture of individuals liable for removal from the UK, including time-served foreign national offenders (TSFNOs), overstayers, failed asylum seekers and others who have breached immigration laws.
- 5.28 The proposed increase in IRC capacity will:
- Support immigration enforcement and public safety.
 - Provide resilience in detention capacity.
 - Align with government priorities for swift and fair removals.
 - Enable an increase in removal volumes of individuals with no legal right to remain in the UK, including Time Served Foreign National Offenders (TSFNOs).
 - Support public safety through the “Strong Foundations: Secure Borders” and “Safer Streets” missions.
- 5.29 The expansion of Campsfield IRC (from the current 160 beds to a total of 400 beds) would enable more of those with irregular immigration status to be removed from the UK. It will also meet the cross-system requirement for detention capacity whereby the Government’s ambitions to reduce the supported population in hotels require enforced removals for those whose cases are not granted.
- 5.30 The consequences of not securing a timely grant of permission for these proposals include serious impacts on border infrastructure and the Department’s ability to enforce removals. Not progressing with this development would significantly limit our ability to respond to future pressures, manage border infrastructure efficiently, and deliver on policy objectives. The additional IRC is therefore essential to ensure the Department can meet its statutory responsibilities and adapt to evolving operational demands.
- 5.31 It is important to note that demand modelling indicates even more demand in addition to the extra 1,000 places are required to meet projected case flows. Consequently, additional IRC development will be required in addition to the proposed development, and this underlines the importance of expanding Campsfield IRC.

The Public Purse

- 5.32 This investment will support the Home Office in achieving its objectives, including delivering value for money for the taxpayer. A key aim of government policy is to effect the removal of individuals who have been refused asylum or are otherwise liable to removal under immigration law. Effective removal relies on ensuring that individuals are available when required for departure from the UK. Detention

¹¹ 1,000 new places are being provided by the re-opening of Campsfield IRC (160 spaces) and the re-opening of Haslar IRC (130 spaces) together with the expansion of Campsfield IRC (240 spaces) and the expansion of Haslar IRC (470 spaces).

is used, in accordance with statutory powers and published policy, where there is a risk that an individual would not comply with removal directions or would otherwise abscond.

6 Planning Considerations

6.1 This section of the Planning Statement provides justification in support of the outline planning application, with reference to the planning policy framework and material considerations set out in the previous sections. The section is set out in the following order:

- The Spatial Strategy for Cherwell / efficient use of land¹²
- Grey Belt and Green Belt Assessment
- Sustainable Development
- Design Approach
- Landscape and Visual Impact
- Transport
- Ecology and Biodiversity Net Gain
- Flood Risk and Drainage
- Impact on Local Population and Residential Amenity
- Contamination
- Heritage and Archaeology

The Spatial Strategy for Cherwell / Efficient Use of Land

- 6.2 The proposed development comprises an extension of an existing IRC facility, which is an important part of the Government's (Home Office) national infrastructure.
- 6.3 The Development Plan does not make provision for the expansion of the Campsfield IRC. The Proposals Map shows the site within the Green Belt with no specific land use allocation or designation.
- 6.4 The Spatial Strategy for Cherwell District directs most of the growth towards Banbury and Bicester. In relation to Kidlington, the plan states *"Kidlington's centre will be strengthened and its important economic role will be widened. Economic development will be supported close to the airport and nearby at Begbroke Science Park."* Related to this strategy is the proposed minor review of the Green Belt in this location "to accommodate identified employment needs at Kidlington", which also includes the application site.
- 6.5 Campsfield IRC employs a significant number of people, and the proposed extension will create approximately 176 additional full-time jobs. Whilst not a 'typical' employment use, the proposed development will result in employment being focussed in a location consistent with the Spatial Strategy for the Cherwell.

¹² Previously Developed Land / Brownfield Land

- 6.6 National and local planning policy seeks to secure sustainable patterns of development and regeneration through the efficient re-use of previously developed land, and through concentrating development in accessible locations.
- 6.7 The proposed development seeks to make the most efficient use of land that has been previously developed or has been under-utilised. The expanded IRC will be located within the existing perimeter fencing with the exception of a new gatehouse and some small single storey ancillary buildings. This approach is consistent with paragraphs 124 and 125 of the NPPF.

GREEN BELT AND GREY BELT

- 6.8 NPPF Paragraph 155 states that development may be regarded as not inappropriate in the Green Belt where all of the following apply:
 - A. Development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (i.e. Cherwell District Local Plan).
 - B. There is demonstrable unmet need for the type of development proposed.
 - C. Development is in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF; and
- 6.9 This section comprises an assessment of the contribution to the purposes of the Green Belt as set out in paragraph 143 of the NPPF.

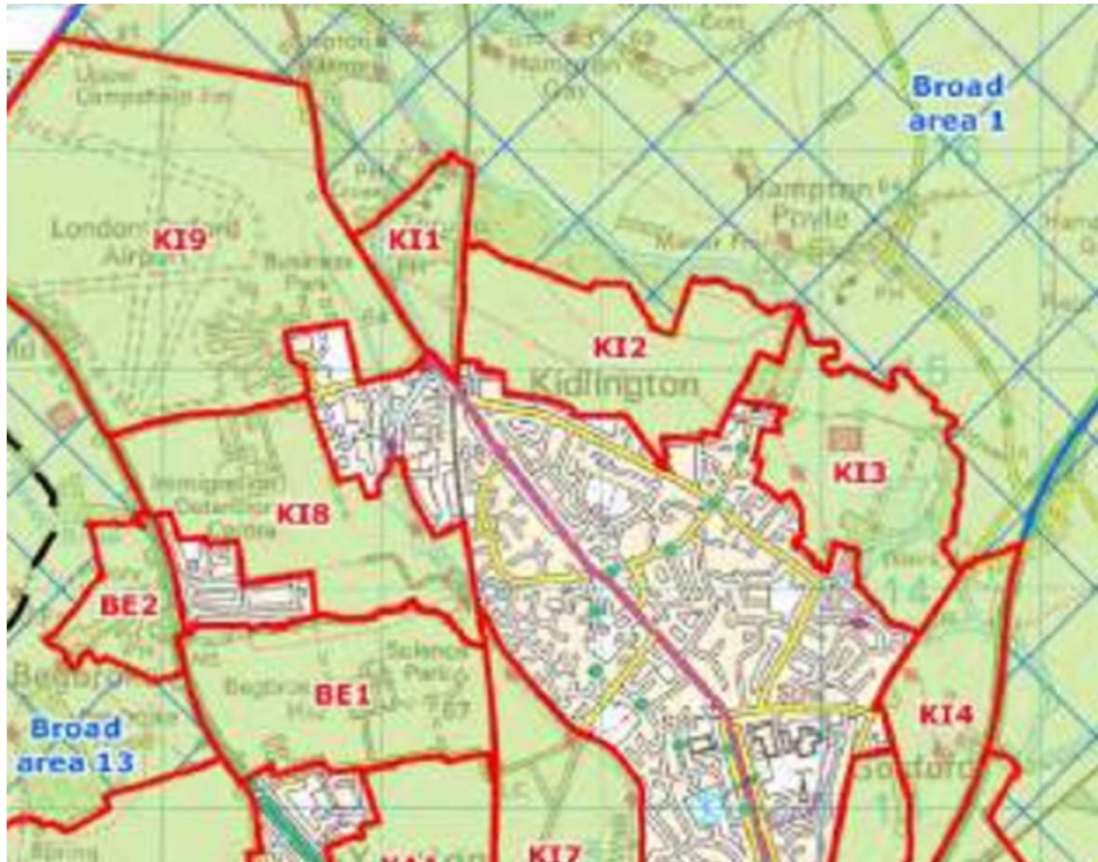


Figure 6.1: Extract from Oxford Study 2015

6.10 The first test ¹³is to determine whether any part of the site could be defined as ‘grey belt’, which is defined in Annex 2 of NPPF and in Ministry of Housing, Communities and Local Government (“MHCLG”) Green Belt Guidance Note (updated 2025) as land that does not strongly contribute to the following Green Belt purposes:

1. unrestricted sprawl of large built areas
2. prevent merging of neighbouring towns
4. preserving the setting of historic towns

6.11 In addition to the above, land can only be identified as grey belt where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would not provide a strong reason for refusing or restricting development. The application site does not include areas or assets in footnote 7 of the NPPF with the exception of Green Belt.

6.12 The pre-application advice from LPA considers the potential grey belt status of the application site and concludes:

“The Campsfield compound is clearly developed land. The built envelope is compact, long established and visually associated with other development land along Langford Lane. This weighs in favour of it being classified as grey belt in due course.

Contribution to Green belt purposes:

- *In terms of checking the sprawl of the built up area and preventing neighbouring settlements from merging, the primary function is performed by the surrounding open land, rather than by the already developed compound itself. The complex reads as a discrete block of development within the wider open gap.*
- *The site is not closely related to the historic core of Oxford or to a recognised historic town, so its role in preserving historic setting is limited.*
- *On that basis the development envelope arguably makes only a moderate or limited additional contribution to the key Green Belt purposes when compared with the open fields around it.*
- *Environmental/Heritage constraints: The compound itself is not understood to be subject to the most restrictive designations such as SSSI or designated heritage assets.*

Taken together, these factors suggest that the built part of the Campsfield site has characteristics which are consistent with grey belt as now understood nationally. It is previously developed, visually contained and part of a wider corridor already influenced by large scale development.”

6.13 The table below provides CDC’s judgement of contribution to purposes 1, 2 and 4 in relation to parcel KI8 (see figure 6.1 above), within which the site is located, from the 2015 Oxford Green Belt Study (OGBS), alongside our own assessment.

¹³ ID:64-005-20250225 Green Belt Guidance (February 2025)

Table 6.1 – Green Belt Purpose Summary

Green Belt Purpose	Assessment on contribution to Green Belt purpose	
	OGBS 2015 assessment of Parcel K18	C&W assessment of application site
A	No contribution ¹⁴	No contribution
B	High contribution	No contribution to prevent towns merging.
D	Low contribution	Low contribution

- 6.14 In relation to purpose B, the Oxford Green Belt study states that parcel K18 “*occupies the entire width of the gap between Kidlington to the east and Begbroke to the west, and is largely open, arable farmland. The parcel therefore plays a strong role in preventing the merging of the two settlements, as any encroachment by either settlement would be likely to result in a significant physical and visual reduction in the gap.*” (our emphasis)
- 6.15 It is considered that the ‘largely open’ nature of Parcel K18 and that it extends the entire gap between Kidlington and Begbroke affords the parcel overall a strong contribution to purpose B of the Green Belt. However, when considering individual sites within this wider parcel, the strength of the contribution varies.
- 6.16 In considering Green Belt purpose D, the OGBS notes that “*Within the parcel itself the northern central area has been wholly developed and represents a significant urbanising influence on characteristics of the countryside within the parcel. The parcel contains residential dwellings along Evenlode Crescent, an ambulance station and a cluster of large buildings used as an immigration detention centre [the application site]. A small cluster of industrial buildings also lie within the eastern edge of the parcel.*”
- 6.17 The clear distinction between the previously developed area in the north of parcel K18 does, in our view, reduce the overall contribution the site makes to preventing merging between Kidlington and Begbroke from taking place. However, it is important to note that neither Kidlington nor Begbroke are towns, they are both villages. Accordingly, it is considered that purpose (b) of the Green Belt is not engaged in this case. Even if it were engaged, the proposed development is located within the grounds of an existing IRC and set within a 5.5m fence line.
- 6.18 The extract of CDC’s adopted Local Plan Proposals Map (figure 6.2) shows the location identified by CDC for a limited Green Belt Review (dashed brown line). The area includes the application site, the adjoining Oxford Technology Park and the Oxford Airport campus north of Langford Lane. Notably, the adopted policy recognises the clear distinction between the application site and the wider OGBS Parcel K18.

¹⁴ The parcel lies adjacent to Kidlington which is not considered to be a large built-up area. Therefore, the parcel is not considered to contribute to checking the unrestricted sprawl of large built-up areas.

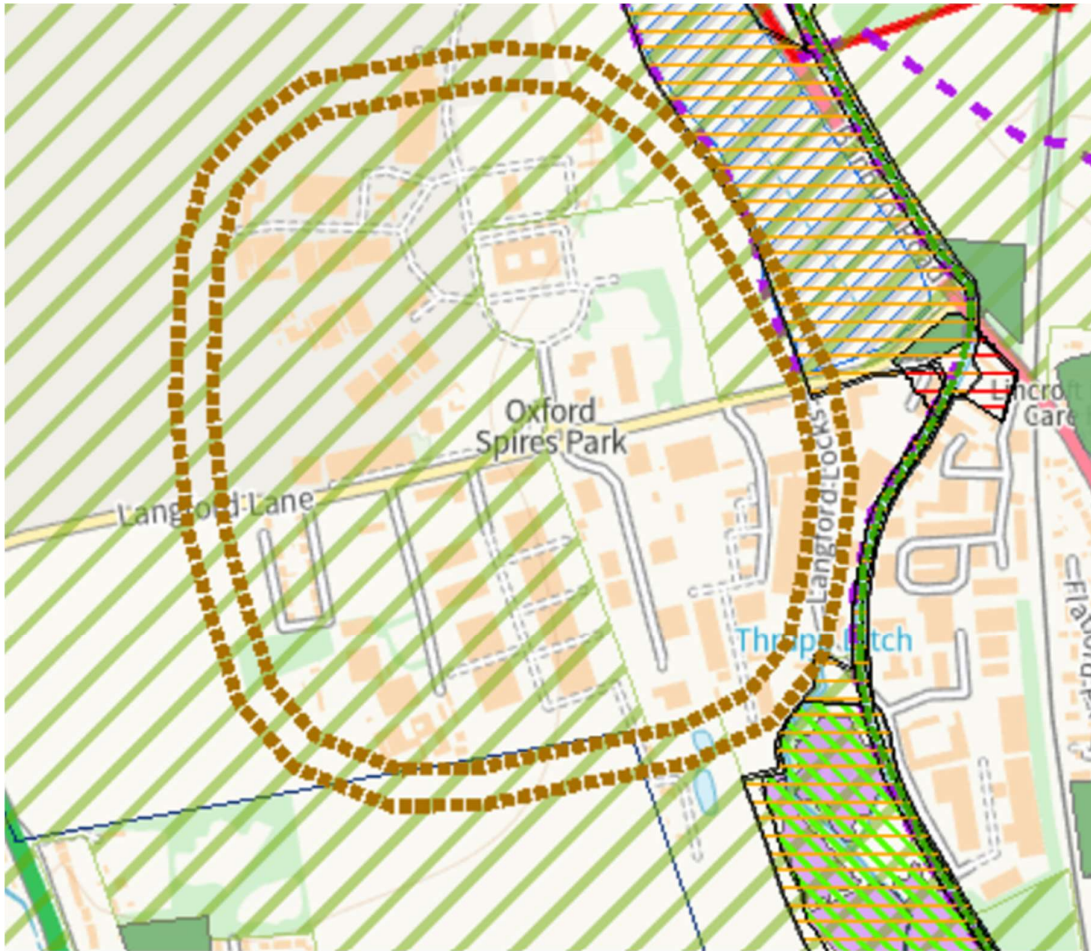


Figure 6.2: Extract from adopted Cherwell Proposals Map

- 6.19 It is important to acknowledge that the Officer’s Committee Report for the 2014 Campsfield IRC application (14/01778/F) concluded *“the proposals would compromise the openness of the Green Belt and by virtue of the site’s relationship with the northern edge of Begbroke promote coalescence of two settlements.”* However, whilst the proposed development would result in buildings being located closer to Begbroke, the fact that the building would be set behind a substantial 5.2m security fence would not promote the coalescence of two settlements, as the clear defined boundary is maintained.
- 6.20 Furthermore, the contribution of the Green Belt to preventing the merging of neighbouring towns is not considered to be engaged here since Begbroke is not a town.
- 6.21 A recent Planning Appeal (Ref: APP/D3640/W/24/3347530)¹⁵ considered the matter of Green Belt purpose (b) where the relevant settlements were both villages of varying scales, as is the case in this application (Kidlington and Begbroke are both identified as villages within the adopted Local Plan). Within the appeal, the Inspector stated that *“I consider that Bagshot and Windlesham fall into the categories of villages of varying scales. Purpose (b) of Framework paragraph 143 is therefore not engaged in this appeal and even if it were, in my view, the development of the appeal site would not result in Bagshot or Windlesham merging or appearing materially closer to one another”.*

¹⁵ Land at Grove End, Bagshot, Surrey – Application for 135 dwellings.

- 6.22 Further, planning permission (ref: 14/02067/OUT) was granted on 10th October 2016 for the development of Oxfordshire Technology Park. In determining the application, the committee report (paragraph 6.5) stated in relation to purpose 2 of the Green Belt:

“In the opinion of the Development Services Manager (DSM), this harm does not extend to the promotion of the coalescence of settlements (paragraph 80), namely Kidlington and Begbroke. Whilst the Planning Policy Officer questions whether this would be the case, it is concluded that as the technology park would not extend any closer to the boundary with Begbroke than any of the surrounding development (Campsfield House and the Oxford Motor Park) it would be difficult to justify such a position. Furthermore, there would remain a buffer, in the form of a large field, between the development and the north eastern edge of Begbroke.”

- 6.23 It is considered that the proposed development would result in similar impacts to those concluded by the planning officer for the Oxfordshire Technology Park. Specifically, the proposed development is located within the existing boundary of the IRC and would not extend closer to Begbroke (albeit the development would be visible behind the 5.2m fences) and the large field between the development and the north east of Begbroke would also remain.
- 6.24 The application site includes previously developed land. Most of the new buildings are proposed ‘within the wire’ of the existing IRC, i.e. within an area of recreational open space surrounded by a 5.2 metre security fence. The proposed car park extension is located on land that includes an existing cul-de-sac, which remains in place and previously served residential properties that were demolished some time ago.
- 6.25 The NPPF defines previously developed land as:

“Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended in to the landscape.” (our emphasis)

- 6.26 In the recent High Appeal Case R (on the application of Ribble Valley Borough Council) v (1) Secretary of State for Housing, Communities and Local Government (2) Majid Hussain [2025] EWHC 2363 (Admin) court ruling clarified how planners should assess whether part developed green belt site is previously developed land or not.
- 6.27 The decision centred around the application of R (on the application of Lee Valley Regional Park Authority) v Broxbourne BC [2015] EWHC 185 (Admin).
- 6.28 In Broxbourne, Ouseley J stated in paragraph 51 that while *“the flexibility in the NPPF for previously developed land may not require every part of the application site to have been previously developed land, the presence of some previously developed land within an application site does not make the whole site previously developed land either, applying the definition in the NPPF”*.
- 6.29 In Ribble Valley, Judge Ridge ultimately found in Paragraph 72 that: *“The Inspector appears to have undertaken an assessment of the site and concluded that the whole site was PDL. His bare conclusion that the site was PDL gives no indication that he has taken into account the different elements and parcels of the site and their differing characteristics as against the glossary definition. <...> A more detailed analysis as to the constituent parts of PDL was needed to support a lawful conclusion that the whole site was PDL.”*
- 6.30 Based on the above, it is considered the application site can be assessed in two distinct parts:

- Southern section – land comprising the existing IRC and the proposed development area, both enclosed by the existing security fence of Campsfield IRC, as well as the existing car park and access road.
 - Northern section – land consisting of a cul-de-sac that previously served residential properties that were demolished in the 1970's / 1980's.
- 6.31 The southern section is considered to be previously developed land as it falls within the long-established curtilage of the existing IRC with large scale fixed infrastructure surrounding it. This area of land falls within the same physical enclosure as the IRC buildings and is directly connected with its use, i.e. it passes the 'part and parcel' test as established in the Court of Appeal decision of R (Hampshire County Council) v Secretary of State for Environment, Food and Rural Affairs.
- 6.32 The northern section had blended back with the landscape and is not considered to be previously developed land. Nonetheless it remains Grey Belt for the reasons described above.
- 6.33 The next test set within the NPPF is whether all purposes of the remaining Green Belt in the Cherwell District would be fundamentally undermined by this development coming forward. It is considered that this would not be the case as:
- Kidlington is not a large built-up area and the OGBS 2015 recognises the site makes no contribution towards this purpose. The proposed accommodation block is visually and spatially well-contained within the existing secure perimeter fence of the IRC.
 - Development on the site would have only a modest effect on physical and visual separation between Kidlington and Begbroke as it would be set within the existing IRC and the site is already viewed as a developed area as evidenced in the report.
 - The site includes previously developed land. The proposed accommodation block will be located within the bounds of the existing secure fence line of the IRC, which is considered to be significant in minimising the site's countryside characteristics.
 - The site is a significant distance from the historic city of Oxford.
- 6.34 Even if it is considered that the whole application site does not comprise previously developed land, the whole application site is considered to fall within the definition of Grey Belt land if it does not 'strongly contribute' to any of the purposes in paragraph 143 (a), (b) or (d) of the NPPF, as set out above.
- 6.35 Accordingly, it is concluded that the application site comprises Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across Cherwell District. Therefore, Paragraph 155a of the NPPF is met.
- 6.36 The need for the proposed development is explained in section 5 and demonstrates that Paragraph 155b of the NPPF is met.
- 6.37 The proposed development is in a sustainable location, as explained below and within the supporting Transport Assessment and Travel Plan. The existing IRC recently reopened (December 2025) and the proposed development seeks to extend the existing facility to accommodate up to 400 detained persons.
- 6.38 The proposed development seeks to limit the need to travel and offers a genuine choice of transport modes. The Travel Plan demonstrates that sustainable transport modes have been prioritised taking account of the vision for the site, the type of development and its location. Safe and suitable access to the site has been achieved through the refurbishment of the IRC and the proposed development includes improvements to pedestrian and cycle access to the site. The design of the proposed parking areas and transport elements reflect current national standards.

- 6.39 The Transport Assessment submitted with the application explains the likely impact from the development on the transport network and on highway safety and demonstrates how the proposed development incorporates adequate mitigation. This demonstrates that Paragraph 155c of the NPPF is met.

VERY SPECIAL CIRCUMSTANCES

- 6.40 Notwithstanding the applicant's opinion that the site constitutes Grey Belt, the applicant considers that, in the event the determining authority does not accept the site is Grey Belt, there are Very Special Circumstances (VSC) that clearly outweigh the harm to the Green Belt and other harms resulting from the proposal. Specifically, there is an urgent and pressing need for the provision of additional IRC accommodation as set out in section five of this statement. The site is the most appropriate location for providing additional IRC accommodation, as evidenced within appendix E of this statement.
- 6.41 Overall, it is therefore considered that a unique set of VSC exist to justify the proposed development, and that these are significant enough to sufficiently outweigh the identified harm to the Green Belt associated with the proposals.

Harm to Openness

- 6.42 Planning Practice Guidance (PPG) sets out that establishing the impact of a proposal on the openness of the Green Belt requires a judgement based on the specific circumstances of the proposal. PPG goes on to state that the Courts have confirmed this can include consideration development.
- 6.43 This guidance is reinforced in the Supreme Court decision in R. (oao Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] which confirmed that consideration of visual openness is a relevant issue to consider when making judgements on Green Belt openness.
- 6.44 The visual impact on openness is more than just a consideration of the impacts on visual amenity (assessed through the submitted Landscape and Visual Impact Assessment), and should include matters such as the type, scale and volume of the proposed development, impact to long-distance views and the spatial location of development.
- 6.45 The proposed expansion of the IRC will be located within the bounds of the existing secure fence line to Campsfield IRC. The development occurring outside of the bounds of the existing secure fence line comprises a car park extension and a single storey ancillary building on land that is surrounded by the IRC to the south, housing to the west, Oxford Airport to the north and Oxford Technology Park to the east.
- 6.46 The spatial dimension of the openness of the site is influenced by the existing secure fence line. The Landscape Visual Assessment (LVA) submitted with this application identifies that the wider spatial context of this area limits the overall effect on landscape character. It concludes that *"the site is not in or close to any designated landscapes. There will be localised effects on non-designated landscape. The development will have a visual effect on the appearance of the site, and this will be apparent in views from public rights of way, local roads and residential properties. The effects will be localised in geographical extent."*
- 6.47 The LVIA also notes that *"there will be some perception of closing the gap between developments growing out from Kidlington and Begbroke Village, however this is in the context of the countryside in the immediate area of the site being already heavily influenced and compromised by existing industrial, institutional, commercial and residential development."*
- 6.48 Nonetheless, the proposed development would be significant in its scale and the accommodation block will be visible above the extended perimeter fence. The LVIA concludes that *"overall the impacts on the landscape are local and are judged to range from moderate to moderate-minor in terms of significance."* In terms of visual impacts, the visual influence of the existing site is judged to be *"relatively limited due to the physical and visual screening created by built development, vegetation*

and topography.... The significance of the impact is up to Moderate-Major but affecting relatively few properties.”

- 6.49 As such, it is considered that the proposed development will result in some adverse impact on the openness of the Green Belt, albeit the spatial impact is heavily influenced by the existing IRC and the adjacent Oxford Technology Park.
- 6.50 The Officer’s Committee Report for the 2014 Campsfield IRC extension application (ref: 14/01778) considered the VSC case at the time and concluded at paragraph 5.49 that The Officer’s Committee Report of application that *“If Members are therefore satisfied that the Campsfield House proposal is the only currently viable option to significantly increase capacity within the IRC system and that the proposed extensions would represent a substantial enough improvement in conditions for those who would otherwise be accommodated in the prison system, then Officers believe that it is reasonable to conclude, in the absence of any other issues that compromise the acceptability of this proposal, that there is a sufficiently robust VSC case, on balance, to overcome the policy objection. This application is therefore recommended for approval.”*
- 6.51 It is recognised that the 2014 application was not determined and that there was criticism of the assessment of need for additional IRC accommodation, as well as the approach to site selection. The situation in 2025 differs from 2014 and the section below explains how the need for the development has been identified and the approach to selecting the extension to Campsfield IRC.

SUSTAINABLE DEVELOPMENT

- 6.52 The proposals comply with the three pillars of sustainability outlined in the NPPF as follows:
- Economic Sustainability – The proposed development will deliver economic growth through the construction of the IRC expansion. The construction phase of this scheme will support the creation of new job opportunities, and once complete, the expanded IRC will create another 176 full time jobs. The employees of the IRC will help local business in terms of direct and indirect local spend. Over the lifetime of the development there will be employment opportunities associated with the upkeep and maintenance of the IRC.
 - Social Sustainability – The development of the IRC expansion will provide important and urgently needed national social infrastructure that will help enable the Home Office to meet its Immigration Enforcement objectives. The IRC provides the health (primary care) and well-being requirements of detained persons on site.
 - Environmental Sustainability – The proposed scheme makes effective use of the site and delivers a density of development reflective of the surrounding area and promotes sustainable modes of transport via the new cycle way and footpath and the creation of a new pedestrian crossing to the nearby bus stop. The indicative layout also introduces landscaping improvements. The proposed development is compliant with high standards of energy and water efficiency and exceed Development Plan requirements. The proposal will incorporate ecological mitigation and enhancement measures. The majority of existing trees will be retained and protected, and new soft landscaping will provide new trees.
- 6.53 An Energy Strategy Report and Statement (MZA Consulting) is submitted with the OPA. The report demonstrates preliminary compliance with the Development Plan (principally Policy ESD1 to ESD5) and the NPPF. The report confirms that all new buildings will be developed to BREEAM Excellent standards, which exceeds the requirements of the Development Plan. The provision of solar panels within the indicative site layout has been informed by the energy strategy and represents an approach endorsed by the LPA within its pre-application advice.
- 6.54 The report concludes that “the site wide energy efficiency measures and indicative photovoltaic provision result in a meaningful reduction in energy demand for the proposed development”.

DESIGN APPROACH

- 6.55 The NPPF requires the delivery of well-designed places. It requires the proposed development to function well and add to the quality of the area, to be visually attractive and set within appropriate and effective landscaping so that it is sympathetic to the surrounding area. The NPPF also states that significant weight should be given to proposals that raise design standards or demonstrate innovation and sustainability.
- 6.56 Whilst this OPA only seeks detailed approval of the proposed site access, an indicative proposal has been developed to show how the scale of development could be accommodated on the site. The Design and Access Statement (DAS) explains how the proposals developed and the rationale for the preferred option, which is presented as an indicative plan that falls within the development parameters for the site.

Layout, Scale and Appearance

- 6.57 The indicative proposed site layout is a refinement of the 2014 extension application. It has been developed following pre-application discussions with the LPA and DLUHC. The proposed development will meet and exceed sustainable design standards.
- 6.58 The proposed accommodation block is the largest building and is necessarily located within the existing secure boundary. The location of the accommodation block has been moved as far as possible to the north and east of the development area to reduce the impact of the development on the landscape and the openness of the Green Belt. Thus, the indicative scheme has been designed so that where it is visible it will be an acceptable addition to the landscape, seen against the backdrop of existing large buildings and with views filtered by existing landscaping.
- 6.59 The DAS highlights that the overall height is reflective of the institutional floor to floor dimension requirements for secure custodial environments together with integrated plant on the roof. Alternative options with plant space at ground floor level. However, this significantly reduced external amenity space, perimeter circulation and security stand off distances. Locating plant within the roof space minimises visual impact and supports efficient distribution of services throughout the proposed building.
- 6.60 As the indicative layout is similar to the 2014 application, it is relevant to note that the Committee Report states the following:

“In terms of scale, buildings range from single to three storeys in height. The IRC main building is predominately three storeys and is of a large institutional scale and appearance. While at odds with the agricultural surroundings, the scale of the buildings sits comfortably with the scale of existing detention centre buildings. The site is already contained within the outer security fence which restricts access and limits views.”

“Due to the highly specialised nature of the facility, the high security compound within which it is located and the exclusion of public access from within and around the buildings; I do not raise any urban design issues with the proposal. While the buildings are considered to be of a functional design with no architectural merit, they shall not be used or experienced by members of the public, except by partial views from some distance.”

- 6.61 A single storey ‘Escorts’ building is proposed at the northern end of the extended car park adjacent to the existing ambulance station. A single storey ‘Visitor’s’ building is proposed on the existing car park close to the secure entrance to the IRC. These are the only two buildings necessarily situated outside of the secure IRC.
- 6.62 The proposed development includes an extended car park to meet the operational requirements of the expanded IRC. The indicative layout shows the provision of solar panels provided above the car parking area. An earth bund on the western site of the proposed car parking area can be improved with landscaping (as shown in the indicative landscaping plan) to soften the impact on nearby residential properties and planting is proposed throughout the car park to soften the environment. An indicative

lighting plan demonstrates how lighting impacts to adjoining uses and ecology can be adequately managed. Wherever possible, existing trees have been retained on the site.

6.63 The approach to the site layout, scale and appearance is in accordance with prevailing policy.

Suitable accommodation for Detained Persons

6.64 The organisation and massing of the proposed building have been carefully considered to create a safe, secure, and well-managed environment. The coherent and legible layout supports clear wayfinding through easily identifiable routes and sightlines, offering transient occupants a natural sense of orientation both internally and externally. Outdoor recreational courtyards are strategically positioned to benefit from a south-facing aspect, while landscaped gardens are located to the north, enhancing amenity and visual quality.

6.65 All rooms in the IRC extension will meet the standards as set out in the accommodation standards Detention Services Order 06/2018 (DSO). DSO sets out requirements for accommodation to comply with Rule 15 of the Detention Centre Rules 2001.

6.66 This includes size, lighting, heating, ventilation and fittings that are adequate for health, as well as, it has adequate storage facilities (consistent with the interests of security and safety and it allows a detained individual to communicate with an officer at any time.

6.67 All rooms proposed at IRC are single occupancy. DSO does not set out size requirements, but room should be sufficient to accommodate at least one single bed, storage for personal possessions, a chair and use of a table and space for circulation and movement. The proposed rooms are between 9 sq. m. and 11 sq. m. All accommodation will have heating, lighting and ventilation to the technical standards set out in DSO. The requirements for the size of DSO are met for suitable and humane accommodation.

6.68 All wider facilities, such as education, healthcare and faith related facilities will be entirely contained within the site and proposed to Home Office standards. In relation to the proposed development, this will comprise:

- New accommodation blocks with single and double occupancy rooms – increased room sizes.
- Integral toilets and basins in new-build rooms
- Dedicated spaces for healthcare, faith, education and recreation
- Fitness suites, TV room, and cultural kitchens
- DDA-compliant rooms

6.69 The indicative floor plans demonstrate how the design standards can be met.

Access and Parking

6.70 The OPA seeks detailed planning permission for access. The proposal retains the existing access from Evenlode Crescent onto Langford Lane. The proposed access plan demonstrates that the existing access can operate safely. Within the site there is an existing security barrier, which will remain place.

6.71 As part of the refurbishment of Campsfield IRC, a pedestrian and cycle route were introduced along Evenlode Crescent. The proposed access plan shows how these routes thread into the highway network. Additionally, the proposal includes the provision of a pedestrian crossing on Langford Lane to improve safe access to the nearby bus stop on the opposite side of the road. This mitigation has been agreed with the Local Highways Authority through pre-application discussions.

6.72 The proposed highway layout and access are shown on the enclosed Design and Access statement by Edgingtons Architects, and it is assessed in the Transport Assessment prepared by Curtins. The layout

of the proposed development has been designed to ensure safe and ease of access and movement for all users, including pedestrians and cyclists.

- 6.73 The proposed development extends parking provision from 97 to 325 car parking spaces. The amount of disabled and EV charging spaces will comply with Local Highways Authority requirements. The indicative layout shows how the level of car parking can be provided. Sheltered cycle parking is proposed immediately adjacent to the IRC entrance.

LANDSCAPE AND VISUAL IMPACT

- 6.74 The NPPF and Development Plan require landscaping to be effective and contribute towards making developments visually attractive.
- 6.75 As established, the indicative proposal incorporates private amenity spaces within the IRC and landscaping across the site. Edgingtons Architects prepared an indicative landscaping strategy to support the application. The strategy will ensure that all areas of landscaping are attractive and effectively improve the proposed development as far as possible. The landscaping plan has been informed by the Landscape and Visual Impact Assessment (LVIA) also submitted with the application.
- 6.76 An LVIA is submitted with this application and was prepared by ASA Landscape Architects. The LVIA assesses the landscape setting itself and secondly the visual impact of the proposed development on the surrounding areas from which views are possible.
- 6.77 The assessment includes level 3 verified photomontages from viewpoints that have been discussed and agreed with the LPA. As this is an OPA, the photomontages themselves are modelling visualisations¹⁶, which do not show architectural details or finishes. The images are intended to provide an appropriate level of visualisation to demonstrate the height, scale and massing of the buildings in the context of the site and its surroundings.
- 6.78 The LVIA concludes that *“the site is not in or close to any designated landscapes. There will be localised effects on the non-designated landscape. The development will have a visual effect on the appearance of the site, and this will be apparent in views from public rights of way, local roads and residential properties. The effects will be localised in terms of geographical extent.”*
- 6.79 In terms of impact, the LVIA concludes that *“there will be some perception of closing the gap between the developments growing out from Kidlington and Begbroke Village, however this is in the context of the countryside in the immediate area of the site being already heavily influenced and compromised by existing and/or newly built industrial, institutional, commercial and residential development including Oxford Airport and transport corridors. There will be some local landscape and visual impact resulting from the new development on the Campsfield site, but this is not considered to have a significant impact on the wider countryside.”*
- 6.80 The LVIA notes that *“The existing boundary vegetation adjacent to the site on the west and south flanks contributes positively to the local landscape character and provides a good level of screening, particularly in the summer months.”*
- 6.81 The LVIA concludes that *“Overall, the impacts on the landscape are local, and are judged to range between Moderate to Moderate-Minor in terms of significance. There will also be a cumulative effect with other planned and potential development in the area.”*

¹⁶ Type 3 Visualisations as set out in the Landscape Institute Technical Guidance

TRANSPORT

- 6.82 The Transport Assessment prepared by Curtins demonstrates that the proposed development is expected to result in an increase in traffic of 61 two-way trips during the AM and PM peak hours. Given the scale of the development and anticipated impact, with reference to the NPPF, the likely residual cumulative impact of the development is considered to be insignificant and well within the daily variation that could be expected in traffic flows. The development proposal will have a negligible impact on the operation of the local highways network.
- 6.83 An Outline Construction Management Plan prepared by AtkinsRealis is submitted with the application. This includes a framework Construction Traffic Management Plan.
- 6.84 The proposed development will provide improved site access and parking as required by the Development Plan. It is considered the site has a good level of accessibility by sustainable modes of transport.
- 6.85 A Travel Plan is submitted with the application and includes measures to encourage increased sustainable travel by staff and visitors.

ECOLOGY AND BIODIVERSITY NET GAIN

- 6.86 NPPF encourages the protection and enhancement of biodiversity, and minimising impacts. The Development Plan requires a net gain in biodiversity, protection of trees, and reuse of soil, incorporation of features to encourage biodiversity. Applicants are required to undertake habitat surveys where protected species are affected.

Ecology

- 6.87 An Ecological Impact Assessment (ECIA) and Shadow Habitat Regulation Screening Assessment (HRA) Screening Assessment have been prepared by Sweco and is submitted as part of this submission.
- 6.88 Several surveys including detailed botanical, bat, Great Crested Newts, reptile and mammal surveys have been undertaken at the site between 2023 and 2025. The surveys demonstrate that the site found the proposed development site to support an active badger sett as well as 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 in addition to widespread mammal species including brown hare, rabbit and hedgehog.
- 6.89 Mitigation and enhancement measures are proposed for these species, including precautionary working methods, which take into consideration the operational requirements of the site including lighting. A Natural England licence to permanently close a badger sett is required.
- 6.90 Through implementing the recommended mitigation and enhancements including sensitive layout design (retaining boundary habitats where possible), a wildlife friendly landscaping scheme, sensitive practices/management during construction and occupation (detailed via a CEMP), it is considered that any significant negative impacts from the proposed development upon protected and notable habitats and species will be fully mitigated in line with relevant wildlife legislation.
- 6.91 It is therefore considered the scheme will provide suitable biodiversity measures that accords with the development plan.

Trees

- 6.92 CBA Trees Arboricultural Consultancy have undertaken a tree survey on to assess the condition of the existing trees on this site and an Arboricultural Implications Assessment (AIA) to test the impact of the indicative proposed layout.

- 6.93 The AIA confirmed that there are 43 individual trees and 18 groups of trees on the site. It advises that these features were found to be of mixed condition and age providing a variety of amenity benefits.
- 6.94 The AIA concludes that the indicative proposed layout requires the removal of 26 individual trees and 7 groups of trees.
- 6.95 The applicant's approach to site design was to consider the presence of trees, particularly the highest quality, and where feasible seeks to incorporate them within any proposed development. It is acknowledged that the indicative proposed layout results in the loss of a significant number of trees within the site.
- 6.96 There are opportunities highlighted by the AIA for the retention of more existing trees, which can be considered at the Reserved Matters Application stage. The AIA concludes that *"the indicative landscaping plan provides soft landscaping, including the replacement planting of trees and shrubs, and along with the retained trees provides the opportunity for trees to continue to provide tree cover on site, grow and mature with the development layout ensuring long term tree cover on site. Whilst the indicative site layout will require the removal of trees, some of which are arguably near the end of their useful life, the project seeks to plant a greater number of trees/shrubs than those that are removed on site at a ratio of approximately 1:3 with over 100 (one hundred) being planted across the site and provides for ecological enhancements on site."*

Shadow Habitat Regulation Screening Assessment

- 6.97 The development is situated within the 10km impact zone of the internationally designated site Oxford Meadows SAC; the construction and operational impacts of the development are assessed within a separate Shadow Habitats Regulations Screening Assessment by Sweco.

- 6.98 The screening assessment concludes that

"The site does not support the lowland hay meadow habitat for which the Oxford Meadows SAC (located within the 10 km impact zone) is designated, nor is it likely to support creeping marshwort, the plant species for which it is designated.

The hydrological connectivity between the site and the SAC is very limited and therefore no impacts due to increased pollution or water levels are anticipated.

No recreational impacts are anticipated due to the nature of the development as an immigration control centre."

The BNG provision

- 6.99 A baseline habitat assessment and metric calculation for BNG has been prepared by Sweco. Due to the scale of the development and the limited area within which to include substantial biodiversity enhancements, it was concluded that to provide 10% BNG would require off site provision. Accordingly, the applicant has identified and secured BNG credits that will provide the full 10% BNG required by legislation. This will be provided in addition to on site biodiversity improvements on site.
- 6.100 A BNG Assessment is submitted with this application. It concludes that based upon the indicative proposed plan and development parameters, the development results in a net loss of area and linear habitats. It identifies the amount of Biodiversity Units (BU) required to met the targeted 10% BNG.
- 6.101 In accordance with the recommendations, the applicant has identified a BNG provider, Trust for Oxfordshire Environment (TOE), and has agreed a unit pre-purchase of the full amount of BU calculated in the net gain assessment.

FLOOD RISK AND DRAINAGE

- 6.102 The NPPF directs development to areas at the lowest risk of flooding. It requires planning applications to demonstrate that flood risk is not increased elsewhere. It also requires site drainage to include SuDS that control runoff and offer multifunctional benefits such as improved water quality, biodiversity, and amenity. For major developments, SuDS must meet operational standards, include maintenance arrangements, and reflect advice from the Lead Local Flood Authority. Development Plan policies ESD6 and ESD7 include consistent requirements.
- 6.103 The application site is located in Flood Zone 1, at low risk from flooding. The existing use of the IRC and the proposed expansion of the IRC is considered acceptable.
- 6.104 The Flood Risk Assessment (FRA) was undertaken by Curtins and is submitted with this application together with a Drainage and SuDS Strategy. The FRA concludes that the site is at low risk from fluvial flooding, low-medium risk of groundwater flooding, and there is minimal risk of surface water vulnerability with any areas of risk capable of mitigation through drainage design.
- 6.105 The proposed drainage strategy includes for surface water to drain entirely through infiltration via a soakaway and attenuation tanks. Foul drainage will discharge into the Thames Water pumping station that is to be relocated within the site as part of the proposed development. The strategy has been informed by pre-application discussions with the Lead Local Flood Authority (LLFA). Groundwater monitoring is taking place that will inform the final drainage plans to be submitted at the reserved Matters Application Stage.
- 6.106 The site will therefore not be at risk of flooding or increase the flood risk to others as a result of the proposed development. The proposed development is in compliance with the Development Plan and the NPPF.

IMPACT ON LOCAL POPULATION AND RESIDENTIAL AMENITY

- 6.107 The impact on the local population and residential amenity has been carried out through a series of assessments submitted with the OPA. Specifically, this includes:
- Air Quality Impacts – Air Quality Assessment
 - Noise Impacts – Noise Assessment
 - Health Provision – Local Community Impact Assessment
 - Fear of Crime / Community cohesion – Local Community Impact Assessment
 - Economic Effects – Local Community Impact Assessment

Air Quality

- 6.108 In support of this application, Plowman Craven have prepared an Air Quality Assessment to assess potential air quality impacts associated with the proposed IRC expansion.
- 6.109 The assessment concludes that modelling shows current concentrations of all pollutants are below the national air quality objectives.
- 6.110 The assessment suggested a range of mitigation measures for the construction phase, which can be secured via an appropriately worded planning condition.
- 6.111 The assessment concludes that the proposed development adheres to national, regional and local planning policy, and therefore that air quality concerns should not be a constraint on the proposed development.

- 6.112 Given the above, the proposed development accords with the guiding principle of the NPPF and the development plan.

Noise

- 6.113 In support of this application, MZA Acoustics have prepared a Noise Assessment to assess potential noise impacts associated with the proposed IRC expansion.
- 6.114 The results of a baseline environmental noise survey undertaken at the Site were used to inform an assessment of the suitability of the site for the proposed extension.
- 6.115 The assessment concludes that noise levels at the application site are relatively low, such that there are no onerous requirements on the ventilation or mitigation strategy with respect to controlling noise to the accommodation or ancillary elements of the development.
- 6.116 The assessment concludes predicted noise levels from the car park exceed the background noise levels during the night-time; however, the absolute sound levels are suitably low such that is considered unlikely that noise from the use of the car park would cause disturbance to the nearest residences on Evenlode Crescent.
- 6.117 Limits for noise emissions from mechanical plant and equipment were established based on the baseline noise survey measurements. Initial selections for the standby generators and proposed air source heat pumps were reviewed. The assessment demonstrates that the noise limits stipulated by the Local Planning Authority can be met when all units are running concurrently and at maximum duty by implementing acoustic mitigation to units.
- 6.118 Given the above, the proposed development accords with the guiding principle of the NPPF and the development plan.

Light

- 6.119 The NPPF requires developments to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 6.120 A lighting assessment prepared by MZA Consulting has informed the indicative layout and an indicative lighting plan is submitted with the OPA to demonstrate how the operational lighting requirements can be developed without having an unacceptable impact on amenity.
- 6.121 The assessment states that the site has been designated to be located within an environmental zone E3 (medium district brightness area) and that it has sensitive ecological features around the boundary. It notes that *"the inclusion of an opaque, fully sheeted 5.2m fence has limited light spill from inside the site to outside receptors."* Additionally, *"the use of PV canopies at the car park has provided an umbrella effect to the car park lighting, preventing upward light transmission from the general car park area. Overall, it concludes that "the outline design for the developments provides a low energy lighting system with no upward light in line with the requirements of an E3 zone. The impact of lighting on the environment around the development has been assessed and found to be below the proposed criteria."*

Health

- 6.122 Paragraph 96 of the NPPF requires that planning decisions should aim to achieve healthy places and development should enable and support healthy lives by providing adequate sports facilities and meet local health needs.
- 6.123 The existing IRC contains a refurbished Multi-Use Games Area that will remain on the site and will be complemented by additional informal recreation space within the secure area of the IRC.

6.124 The proposed development includes an extended facility that will provide the following health care for the increased number of detained persons within the site:

- Primary care – GP and nurse clinics with enhanced first response capabilities
- Dentistry
- Mental health services for staff and detained persons

6.125 Emergency care will be routed to John Radcliffe Hospital or Horton General Hospital only in exceptional cases. This approach is designed to minimise pressure on local NHS services by ensuring detained persons receive comprehensive care on-site.

6.126 The facility will operate under the Adults at Risk in Immigration Detention policy, ensuring vulnerable individuals are only detained when immigration considerations outweigh health risks.

Fear of Crime / Community Cohesion

6.127 Paragraph 96 of the Framework indicates that planning decisions should aim to achieve inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

6.128 The IRC is a secure facility and detained persons are not allowed to leave the facility. The security measures within the site will be extended to meet the operational requirements of the extended IRC. It is, therefore, unlikely that the proposed development and its operation will give rise to the fear of crime.

6.129 Case law has determined that fear of crime and anti-social behaviour can be a material consideration. However, there must be some reasonable evidential basis for that fear and the object of that fear is the use, in planning terms of the land.¹⁷

6.130 A planning appeal decision (ref: APP/A2280/W/23/3315258) allowed permissions for the proposed change of use of student accommodation to asylum seeker accommodation in Stafford. Whilst numerous objections were raised by local residents, including concerns about crime and anti-social behaviour, the Inspector found that fear of crime, though a material planning consideration, was not supported by substantive evidence in this case.

6.131 Police and other consultees had not objected, and no compelling data demonstrated that the proposal would lead to increased crime or disorder. The Inspector acknowledged that **local** fears were genuinely held but concluded they carried only limited weight in the planning balance.

6.132 The applicant has engaged with Oxfordshire Police through the design process and will continue to do this as the detailed design of the proposal evolves.

6.133 It is recognised that there were previously protests regarding the operation of the IRC in 2018 and there is potential for such protests to take place again and following the expansion of the IRC. Typically protests were in response to national immigration policy. While such demonstrations represent a legitimate form of civic engagement, they may contribute to increased perceptions of disorder and heightened concerns around public safety, particularly when amplified by media coverage or existing local tensions. The Home Office, in coordination with local police authorities,

¹⁷ Smith v FSS [2006] JPL 386

will be responsible for managing any such events to ensure public order is maintained and community reassurance is prioritised.

- 6.134 The IRC site has a procedure put in place to manage site security and protests and regularly liaises with Thames Valley Police. This process will continue when the expansion takes place.
- 6.135 Security staff provide a 24/7, 365-day presence at the site. All security personnel will be appropriately licensed and security vetted. Access and egress to the site will be controlled by the security team, and all access gates in use are staffed and secured at all times. There will be a combination of fixed and mobile CCTV across the site, with coverage focused on the access points.
- 6.136 There is no statistically relevant evidence to support the claim that IRC will increase crime in the local area.
- 6.137 The Home Office will ensure there are open channels of communication available with the community to ensure they are able to raise any concerns, including those relating to security.

Economic effects

- 6.138 It is anticipated that the construction phase will create 250 net additional jobs. This employment boost has the potential to provide opportunity to local people who are currently unemployed or with poor labour market contributions, as well as through apprenticeship opportunities providing wider social value in the area. The Gross Value Added (GVA) uplift for the construction of the scheme can be estimated at approximately £15 million per annum reflecting the net direct and indirect employment in the local authority.
- 6.139 It is anticipated approximately 176 net additional jobs could be generated across the operational phase the development is completed. This employment level has the potential to provide opportunity to local people who are currently unemployed or with poor labour market contributions.

Contamination

- 6.140 The Development Plan (Policy ENV12) requires adequate measures to be taken to remove the threat of contamination, confirmation development is not likely to result in contamination of underground or surface water resources. NPPF requires that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 6.141 A Phase 1 Preliminary Risk Assessment (PRA) has been prepared by Curtins. The PRA confirms the application site is not recorded to be within an Environment Agency designated groundwater Source Protection Zone (SPZ). There are no licensed surface water abstractions recorded within 1km of the application site.
- 6.142 The qualitative risk assessment (QRA) determined an overall Moderate-Low level of risk to human health and Moderate risk to controlled waters associated with on-site sources of potential contamination. A Low risk from off-site sources of potential contamination was considered. A Moderate level of risk was identified for potential on-site and off-site sources of ground gases. The QRA recommending that generic quantitative risk assessments (GQRA) are conducted to confirm the assessment of risk ascribed to each of the respective potential pollutant linkages (PPLs). The report recommends further work, which can be secured by way of a suitable worded planning condition:

Unexploded Ordnance (UXO)

- 6.143 A UXO report has been produced by Alpha Associates. The report confirms that the Semi-Quantitative UXO Risk Assessment concludes the risk to be high. It sets out a mitigation strategy and mitigation measures that can be put in place when carrying out works on site. This will inform

the detailed Construction Management Plan that will need to be approved prior to commencement of development.

Heritage and Archaeology

- 6.144 Section 16 of the NPPF specifies that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. Development Plan Policy ESD15 establishes requirements for new development where the built and historic environment are relevant.
- 6.145 There are no designated heritage assets on the application site or within proximity to the application site. The site is not located within or close to a Conservation Area.
- 6.146 The proposed development is not visible from any heritage assets. Roundham Lock (Oxford Canal) is 969m from the application site (figure 6.3) and Begbroke Hall is 1,112m from the application site (figure 6.4). There is no direct line of sight between the application site and the heritage assets. The only other nearby heritage assets are located west of Begbroke Village. Again, there is no direct line of sight.

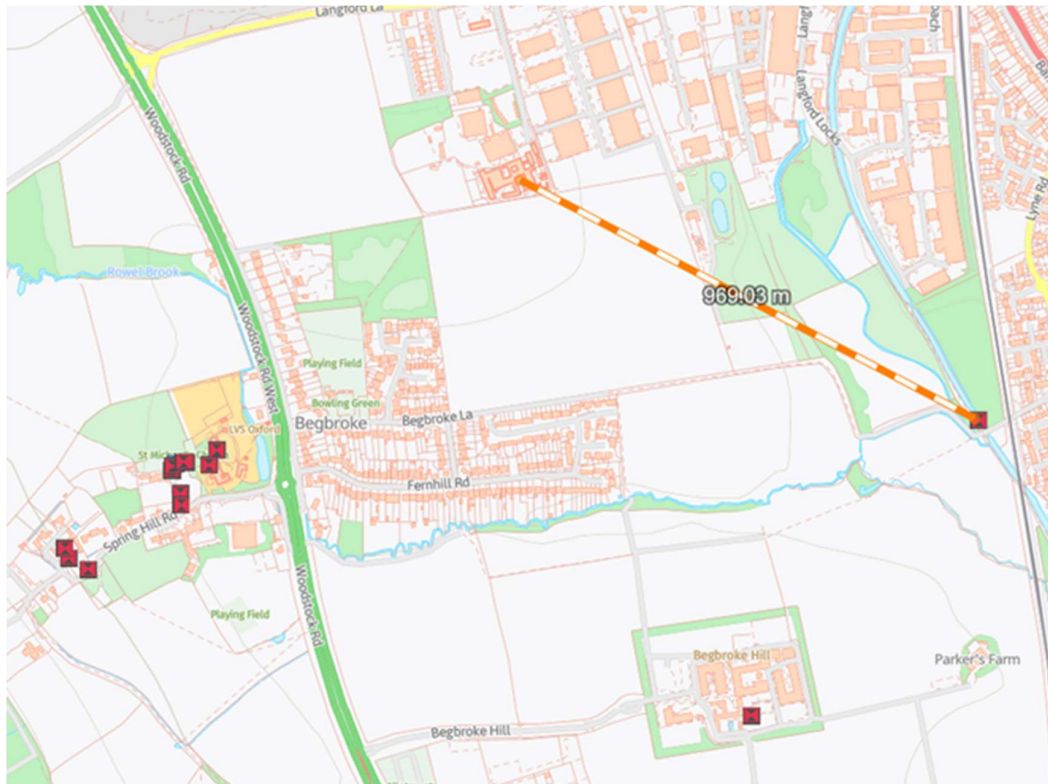


Figure 6.3 – Oxford Canal location



Figure 6.4 – Begbroke Hill Farmhouse location

- 6.147 The applicant has considered the location of the nearest heritage assets to the application site. As there are none that are visible from the application site it is concluded that the proposed development would not affect the significance of the heritage assets. Accordingly, it is considered that the analysis above is proportionate given the absence of nearby heritage assets. A detailed Heritage Impact Assessment is not considered appropriate.
- 6.148 In support of the application at the site an Archaeological Assessment has been prepared by RPS. The Assessment confirms no World Heritage Sites, Scheduled Monuments, Historic Battlefields or Historic Wreck sites have been identified within the vicinity of the study site. The application site is considered likely to have had a modest potential for the later Prehistoric and the Roman periods. Any remains which may be present are most likely to be of local (i.e. low) significance.
- 6.149 The assessment also concludes that past-post depositional impacts within the areas of the study site are considered likely to have had a negative archaeological impact, due to the construction of previous and existing development, since the middle of the 20th century. The south-western area of the study site proposed for development appears to have remained open land throughout its documented history.
- 6.150 Pre-application advice provided by the Oxfordshire County Council Archaeological Officer has confirmed that a stage programme of archaeological investigation can be secured by means of an appropriately worded condition attached to planning consent. In the first instance, a programme of archaeological evaluation should be undertaken in the form of trial trenching targeting the area of proposed development impact
- 6.151 Overall, given the Site's limited Archaeological potential, it is considered unlikely that the proposed development of the site would impact upon any significant archaeological assets which might preclude the development of the Site.

- 6.152 Given the above, the proposed development accords with the guiding principle of the NPPF and the Development Plan

PLANNING OBLIGATIONS DRAFT HEADS OF TERMS

- 6.153 In addition to the range of planning benefits that the proposed development will deliver, it is anticipated that an appropriate package of planning obligations may be negotiated and agreed with the Council in accordance with the statutory tests contained at Paragraph 58 of the NPPF.
- 6.154 Pre-application discussions with the LPA indicate that the Head of Terms may include:
- Travel Plan to Oxfordshire County Council as Highways Authority.
 - Public Transport and Active Travel Contribution to Oxfordshire County Council as Highways Authority.
 - Monitoring fees to Oxfordshire County Council as Highways Authority.

7 Conclusions

7.1 This Planning Statement has been prepared in support of an outline planning application by the Home Office for the development of an extension to Campsfield Immigration Removal Centre on the existing site at Evenlode Crescent, near Kidlington ('the site').

7.2 This submission seeks outline planning permission with all matters reserved apart from access the following development proposal:

"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."

7.3 The proposed development will result in a number of key planning benefits, including:

- The development of nationally important infrastructure to expand the capacity of Immigration Removal Centres to meet the Government's immigration enforcement requirements.
- Creation of new job opportunities during the construction phase of this scheme.
- Additional full time employment opportunities during the lifetime of the development.
- A modern IRC facility that meets the Governments design standards, which will be built to BREEAM Excellent standards.
- Significant planting and landscaping across the site and wider area to protect and encourage wildlife and biodiversity in addition to 10% biodiversity net gain provided off site
- Provision of cycle and pedestrian access improvements and a new pedestrian crossing point on Langford Lane.
- Dedicated parking and covered cycle parking provision including EV charging provision.
- Architecture and materials that will reflect the character and appearance of the wider area.
- A package of financial and non-financial planning obligations that will be negotiated with the Council.

7.4 This Statement has assessed the material considerations arising from the proposals against the NPPF and the prevailing planning policy framework and has demonstrated that the scheme complies with the relevant national and local planning policy and guidance.

7.5 The site is considered to constitute Grey Belt and it has been demonstrated that the proposed development meets the relevant policy tests of Paragraph 155 of the NPPF. In isolation grey belt is not covered within the Development Plan. However, the applicant has also demonstrated there are Very Special Circumstances (VSC) that clearly outweigh the harm to the Green Belt and other harms resulting from the proposal. Specifically, there is an urgent and pressing need for the provision of additional IRC accommodation as set out in section five of this statement. The site is the most appropriate location for providing additional IRC accommodation, as evidenced within appendix E of this statement. Therefore, it is considered that the proposed development is in compliance with the Development Plan.

7.6 Accordingly, in accordance with NPPF paragraph 11 we respectfully request that this outline application is approved.

Appendix A: Site Planning History

Application Reference	Validation Date	Description of Development	Date of Decision	Decision
26/00084/F	14/01/2026	RETROSPECTIVE - Installation of 11 additional lighting columns within existing car park		Under Consideration
26/00266/NMA	30/01/2026	Non-material amendment to 25/01559/F - Changes to fencing between the accommodation block and MUGA • Changes to the fence at the southern corner of the accommodation block	04/03/2026	Application Permitted
25/01559/F	20/06/2025	RETROSPECTIVE - replacement and re-alignment of external fencing and gates	13/08/2025	Application Permitted
23/02381/DEM	29/08/2023	Prior approval for demolition: The structural integrity of buildings is poor and buildings are not suitable for refurbishment	26/09/2023	Prior Approval Not Required
23/01478/SD	01/06/2023	Request for a Screening Direction - - 'EIA not required'	31/05/2023	Screening Opinion Not Requesting EIA
23/01385/DEM	23/05/2023	Demolition of temporary buildings and structures	26/06/2023	Prior Approval not required
14/01778/F	24/10/2014	Expansion of existing immigration removal centre to provide additional detainee accommodation, ancillary detainee and staff facilities, car parking, landscaping and internal fencing	12/03/2015	Application Withdrawn
14/00075/SO	24/10/2014	Expansion of existing immigration removal centre to provide additional detainee accommodation, ancillary detainee and staff facilities, car parking, landscaping and internal fencing	30/01/2015	Screening opinion not requesting EIA
14/00344/F	07/03/2014	Proposed first floor extension to plant/boiler room building to create sprinkler water tank housing	20/04/2014	Application permitted
13/00692/F	20/05/2013	Single storey extension to provide additional sports facilities	09/08/2013	Application permitted

13/00035/SO	20/05/2013	Screening Opinion - 13/00692/F - Single storey extension to provide additional sports facilities	23/05/2013	Screening Opinion Not Requesting EIA
12/01762/F	18/12/2012	Proposed 3 No single storey extensions to provide additional facilities to include closed visit interview rooms, extension to short stay unit, extension to Regime area and relocate portacabin	01/03/2013	Application permitted
12/00054/SO	18/12/2012	Screening Opinion - 12/01762/F- Proposed 3 No single storey extensions to provide additional facilities to include closed visit interview rooms, extension to short stay unit, extension to Regime area and relocate portacabin	03/01/2013	Screening Opinion Not Requesting EIA
08/01942/F	24/09/2008	New Multi-Faith Education and Workshop Unit	09/12/2008	Application permitted
04/01393/GD	14/06/2004	OUTLINE. Proposed extension to the Immigration Removals Centre involving the erection of 2 No. new buildings and utilising the existing access from the public highway.	15/09/2004	Objections
01/01434/GD	10/07/2001	Erection of two temporary portacabins	08/10/2001	Determined application
00/01684/GD	23/08/2000	Demolition of 2 No. existing buildings and erection of single storey modular building together with extension of the existing lay-by to provide additional parking spaces	06/11/2000	Determined application
97/02141/GD	15/12/1997	Two additional storage units	16/02/1998	No objections
96/00911/GD	04/06/1996	Erection of one temporary accommodation unit	15/07/1996	Application refused
96/00853/GD	23/05/1996	Erection of two temporary accommodation units (portacabins).	15/07/1996	Objections
95/00325/GD	28/02/1995	Single storey extension to store building	03/04/1995	Application permitted

Appendix B: 2014 Planning Application Committee Report

Appendix C: IRC Refurbishment Works

The Campsfield IRC works comprised the following:

- Internal refurbishment.
- External refurbishment:
 - Removing grills on all windows
 - Application of insulated render cladding on several of the existing buildings.
 - Replace defective roof coverings.
 - Installation of anti-climb features.
- Plant removal and replacement.
- Realignment of internal roads and footpaths and creation of cycle path.
- Installation of vehicle barrier.
- Demolition:
 - Demolition of existing accommodation block (CDC ref:23/02381/DEM)
 - Demolition of modular buildings and structures (CDC ref:23/01385/DEM)
- Building extensions and new facilities:
 - Single storey ground floor accommodation.
 - First floor extension accommodation.
 - Construction of new refuse and collection point.
 - Replacement accommodation block.
- Temporary accommodation
 - Single storey modular accommodation.
- Replacement and upgrading of existing fencing within and around the perimeter of the IRC facilities (CDC ref:25/01559/F).
- Installation of additional and replacement lighting on the IRC car park (CDC ref:26/00084/F)

Appendix D: LPA Pre-Application Advice

Appendix E: Selecting Sites for Additional IRC Accommodation

1. The urgent need for additional IRC accommodation requires the Home Office to identify appropriate sites to help meet this need. In the appeal decision for the Bicester IRC (ref: APP/C3105/V/02/1097456 – referred to as ‘the Bicester Decision’) the Secretary of State agreed with the Inspector that *‘it is not necessary for the Home Office to carry out an exercise comparing the site against alternative locations.’*
2. Although there is no policy requirement to consider alternative locations, the Home Office considered whether there are other suitable alternatives for an IRC expansion that are available and deliverable and that may be a more suitable site.
3. The method adopted by the Home Office for the site selection process reflected practical requirements in meeting the accommodation need, which is urgent.
4. The task of site searching is difficult and time-consuming due to the contentious nature of the proposed development. Accordingly, the methodology to site searching was focussed to avoid an unreasonable delay and cost to the process.
5. Accordingly, the Home Office assessed its existing portfolio, followed by a review of other sites in public ownership that were immediately available to meet the timeframe required for the proposed development. The staged approach is summarised in table 5.3 below.
6. Re-opening and/or expanding existing IRCs was prioritised, as this was considered the quickest way to provide additional capacity in a location that already benefits from the necessary security infrastructure.
7. The Home Office outline specific criteria which need to be met to facilitate the proposed development, as significant consideration must be given to the specific demands of an Immigration Removal Centre. Criteria are prioritised and failure to meet those of high priority means that the site fails to proceed to further examination.

Table E1 – Site Assessment Methodology

Stage 1	<ul style="list-style-type: none"> a. Home Office Ownership (IRC Portfolio – i.e. expansion) b. Home Office Ownership (new IRC) c. Other immediately available public land
Stage 2	Catchment Area – London Airports with emphasis on Heathrow
Stage 3	Land available for minimum 200 beds
Stage 4	Value for money
Stage 5	Result – Most suitable and deliverable site

Stage 1 – Home Office Ownership

8. Stage 1 of the assessment is to determine whether the site falls within Home Office Ownership, either freehold or leasehold interest in the site, or whether the site was in public ownership and

immediately available for the Home Office to acquire. The justification for these parameters is that significant investment is required for IRC expansion, and therefore Home Office would not enter this long-term investment if the future of the site were not secure, either in free-hold or long-term lease ownership. New IRC development needs be future proofed for the longevity and viability of the proposal for new bed spaces.

Table E2 – Site Analysis

Site	Ownership	Conclusions
Dungavel	Home Office	Insufficient capacity for minimum additional bed spaces.
Tinsley House	Home Office Lease	Insufficient capacity for minimum additional bed spaces.
Brook House	Home Office Lease	No spare capacity
Yarl's Wood	Home Office Long Leasehold	Insufficient capacity for minimum additional bed spaces.
Derwentside	Home Office	Insufficient capacity for minimum additional bed spaces.
Colnbrook	Home Office	No spare capacity
Harmondsworth	Home Office	No spare capacity
Morton Hall	MOTO with MOJ	Insufficient capacity for minimum additional bed spaces.
Manchester Airport	Home Office Lease	No spare capacity
Larne	Home Office Lease	Insufficient capacity for minimum additional bed spaces.
HMP Camp Hill	Ministry of Justice	Decommissioned Prison. Strategic land use allocation for housing. Discounted as a result of logistical constraints and conflicting objectives.
Campsfield IRC	Home Office	Identified as a viable option as the site previously operated as an IRC and included sufficient adjacent land to support expansion. Its existing infrastructure, configuration and location met the operational, spatial and strategic criteria applied during the site-selection assessment.
Haslar IRC	Home Office	Identified as a viable option as the site previously operated as an IRC and included sufficient adjacent land to support expansion. Its existing infrastructure, configuration and location met the

		operational, spatial and strategic criteria applied during the site-selection assessment.
Linton on Ouse	Ministry of Defence	Discounted due to location, poor road access, and airport/seaport access. Deliverability concerns.
Driffield	Ministry of Defence	Not available in time required and remains an operational MoD site.
Sculthorpe	Ministry of Defence	Discounted due to location, costs, and lack of utility infrastructure.
Wethersfield	Home Office / Ministry of Justice	Not available in the time required and providing open asylum accommodation.
Cast Horsham	Home Office	Discounted due to size, cost, and capacity
Sandridge	Ministry of Justice	Discounted due to location, size, cost, utilities, and capacity.

Stage 2 Catchment Area

9. The location of new bed spaces, in close proximity to the airports used for immigration removal, is the second essential factor in site selection. Immigration removal takes place mainly from the London airports, with 90% from Heathrow. The location of bed spaces in the South East of England, in close proximity to the main airports, is beneficial for keeping travel to a minimum, to reduce stress for those being removed and minimise costs.
10. For the reasons listed above, it is important to prioritise new IRC bed spaces in the south of England, with locations closer to Heathrow being preferred. Campsfield IRC is also located adjacent to an existing airport.

Stage 3 – Space for minimum of 200 bed spaces

11. The Home Office needs to achieve the maximum number of bed spaces possible to meet the current shortfall. A higher amount of bed spaces on the Campsfield site will also make the development more cost effective. As part of the expansion, additional ancillary facilities will need to be provided to support detained individuals and staff, in turn increasing the overall amount of floorspace. The number of bed spaces that would be financially viable to support a single proposal is in the order of 200.
12. The amount of additional developable land required for this amount of IRC expansion results in all the other existing IRC sites failing these criteria and not moving forward to Stage 4.

Stage 4 – Value for Money

13. The demand for bed spaces is caused by the need to accommodate increasing numbers of male residents. The opportunities to use existing facilities and staff is a benefit both operationally and financially and can secure improvements to the existing facilities, which will benefit residents and staff.
14. Providing separate accommodation would necessitate constructing an entirely new centre, replicating all facilities, even those already available on an existing site. The cost implications of

a new IRC at a site are such that it is not advisable to proceed on this basis. The Home Office has a limited budget to achieve as many bed spaces as possible.

15. A new IRC to accommodate the same number of spaces would cost significantly more than an extension to an existing facility. The Home Office have a duty to make best use of their budget and utilise the public purse to its maximum potential. Expanding the existing site into Home Office owned land is a much more viable option as the facilities would already be present.
- ~~16.~~ Campsfield IRC has a long history of use for detention purposes, initially as a youth detention facility and subsequently as an Immigration Removal Centre (IRC) from 1993 until 2018. This remains its lawful use. As of the first of December 2025, Campsfield IRC is once again a functioning.
17. Since the closure of Campsfield IRC in 2018, demand for enforced returns has increased substantially, driven by shifting Government priorities and a significant rise in the number of individuals eligible for removal. This has created a clear requirement for additional detention capacity.
18. Refurbished Campsfield IRC is now operational, benefitting from existing infrastructure due to its previous use as an IRC. This has reduced the need for extensive redevelopment and enabling the initial phase to proceed without requiring a new planning permission.
19. Campsfield is located within reasonable proximity to major transport hubs (less than 55 miles from Heathrow airport), facilitating efficient logistics for enforced returns.
20. The location has a sufficient labour market to support the operations of a 400 bed IRC.
21. It is well located for the Home Office immigration control activity, being accessible both to areas where those with no right to be here are encountered and to airports for their removal from the country.

Stage 5 – All Criteria Met

22. Campsfield IRC is one of two remaining sites that meet all the above criteria. They provide the most suitable location and were chosen by the Home Office on this basis. The site is required to meet the immediate identified need



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