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22 September 2026

By email: crownapplications@planninginspectorate.gov.uk

Dear Sir,

Campsfield Immigration Removal Centre (IRC)
Evenlode Crescent
Kidlington
OX5 1GN

For the attention of Mr C Parker, Inspector
Crown Development Applications Team
The Planning Inspectorate

Re: CROWN/2026/0000004 — urgent application for postponement and disclosure

Our firm acts for the Coalition to Close Campsfield ("CCC"), an organisation with Rule 13 status in the inquiry ("the Inquiry") which objects to the proposed redevelopment and expansion of Campsfield House Immigration Removal Centre ("the Proposed Expansion"). The Inquiry is currently due to commence on 6 October 2026.

CCC applies for the Inquiry to be postponed and the associated evidence deadlines reset so that the material identified in Annex 4 can be disclosed and properly considered before the substantive hearing. This is our primary position, not merely a request to discuss redactions at the pre-inquiry meeting on 1 October 2026 ("the Pre-Inquiry Meeting"). The present withholding materially prejudices CCC's ability to instruct experts, prepare its case and test the Home Office's evidence. Proceeding on the existing timetable would not provide a fair opportunity to address that evidence.

We request an urgent written determination of postponement and an interim variation of the 25 September 2026 deadline for CCC's statement of case, proofs and attendee list. Please determine those requests by 4.00 pm on 25 September 2026, or give immediate interim directions if a final ruling is not then possible. The Pre-Inquiry Meeting can remain listed to review disclosure and settle a revised timetable. Its agenda ("the Agenda") should include a discrete item on this application, rather than subsume it within item (ii), "Brief Review of Main Issues". If postponement is refused, CCC seeks the minimum disclosure and protective directions set out below. That fallback position is not to be taken as an acceptance that the present disclosure or timetable is fair.

CCC's application and the scope of disclosure

CCC makes a formal application for disclosure of the redacted and withheld application material necessary to understand and test the case for permission. It seeks the relevant assessments, plans, appendices and supporting information in unredacted form for open examination, subject to the exclusions below and any necessary lawful variation of the existing direction. CCC cannot fairly be required to respond to technical and operational conclusions while being denied their evidential basis. Annex 4, enclosed with this letter, identifies the documents, their relevance, the minimum substantive information required and the resulting prejudice.

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CCC recognises the legitimate protection of national security, the security of premises and property, and of personal information. It does not seek private addresses, identifying medical records, privileged legal advice or unrelated operational vulnerabilities. Any continuing restriction on material evidence must nevertheless have an identified legal basis and be accompanied by a procedure addressing the resulting disadvantage.

The published direction letter is dated 4 June 2026 and responds to the Home Office's request of 13 March 2026. Its Annex A identifies sensitive information under section 293H(7) of the Town and Country Planning Act 1990 ("the 1990 Act"). It includes entire documents, notably the Transport Assessment appendices, Lighting Assessment, Ecological Impact Assessment ("EclA"), biodiversity metric and Ecology Lighting Review, as well as substantial redactions to plans and other assessments. This extends well beyond personal identifiers. CCC seeks reconsideration of the direction's scope and appropriate disclosure arrangements, not permission to disregard an extant direction.¹

The Inspector's Pre-Inquiry Note of 4 September 2026 acknowledges concerns about transparency and the inability to view and comment on the restricted material. Paragraph 4 invites parties to raise concerns within the restrictions. Paragraph 5 states that no closed sessions are intended under powers such as section 321 and directs parties to prepare for public sessions. CCC has prepared on that basis. An open hearing room does not, however, cure the inability to examine the evidence underlying contested conclusions.²

CCC does not know which unredacted versions the Inspector or consultees have received and does not allege that they have seen any. Rather, our client seeks confirmation of that position and of the material on which the Home Office proposes to rely. The concern is both the present lack of disclosure to CCC and the possibility of substantive reliance on withheld written evidence despite the stated intention to hold no closed sessions. Neither the Inspector's access nor access afforded to a consultee substitutes for CCC's opportunity to analyse and answer that evidence.

Why the statutory distinction matters to this application

CCC is not asking the Inspector to declare the 4 June direction invalid. It asks, first, for its scope to be reviewed by the competent decision-maker so that necessary disclosure can occur and, secondly, for an express ruling on the lawful treatment of any evidence which remains withheld. Article 54 of the 2025 Procedure and Written Representations Order restricts public disclosure under that Order of information classified under section 293H(7). It does not itself establish a closed-material inquiry procedure. The publication restriction therefore does not answer how disputed evidence may lawfully and fairly be used at this Inquiry.³

Section 321(2) provides for oral evidence to be heard publicly and documentary evidence to be open to inspection, subject to section 321(3). Rule 2 of the 2025 Hearings and Inquiries Rules ("the Rules") defines a "security direction" as a section 321(3) direction and "closed evidence" by reference to that direction. Rule 27 restricts disclosure of such evidence. The published 4 June letter invokes section 293H(7), not section 321(3). CCC has not identified a separate section 321(3) direction in the material available to it. If one exists or is sought, its existence, open terms and proposed procedural arrangements should be notified to all parties immediately.⁴

Planning Practice Guidance paragraph 056 distinguishes the application-stage restriction from a further section 321 direction for the Inquiry, with provision for an appointed representative or special advocate and open and closed reporting. The absence of an intended closed session does not automatically extinguish a lawful restriction. Equally, an informal process in which withheld written evidence resolves disputed issues is

¹ Ministry of Housing, Communities and Local Government, letter to the Home Office, "Request for a direction under section 293H(7)" (4 June 2026), pp 1–2, and Annex A, "Secretary of State Direction – Sensitive Information Application Documents", pp 1–6 (CROWN/2026/0000004).

² Planning Inspectorate, Pre-Inquiry Note, CROWN/2026/0000004 (4 September 2026), "Main Issues", paras 2–5 (PDF pp 3–4).

³ Town and Country Planning Act 1990, s 293H(7); Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025, SI 2025/409, art 54.

⁴ Town and Country Planning Act 1990, s 321(2)–(6); Town and Country Planning (Crown Development Applications) (Hearings and Inquiries) Rules 2025, SI 2025/410, r 2(1) (definitions of "closed evidence", "security direction" and "appointed representative") and r 27.

not justified merely by keeping oral sessions public. The relevant powers and safeguards must be identified before such reliance is permitted.⁵

Rules 13(3), 13(5) and 13(9) respectively address the full case and documents relied upon, specified further information, and inspection and copying. Their open/closed distinctions must be applied in accordance with the Rules' definitions. CCC requests the exercise of the relevant information and inspection powers, including disclosure of the material supplied in answer to further-information requests, subject to any properly applicable statutory restriction.⁶

Rule 21(16) permits the Inspector to consider documents received before or during the Inquiry provided they are disclosed at it, subject to rule 27 for closed evidence. However, disclosure on the hearing day would not give CCC a reasonable opportunity to analyse technical material given that it depends on third parties for such expertise. CCC seeks an effective opportunity to prepare, supplement its case and question relevant witnesses under rule 21(5), not unrestricted civil-litigation disclosure.⁷

The Planning Inspectorate's Crown procedural guide, paragraph 5.4.1, describes an inquiry as a public process for investigation and formal testing of evidence. Paragraph 4.3.4 addresses responses to additional information accepted after consultation. Those purposes cannot be achieved by allowing CCC only to express general concerns about conclusions whose foundations remain inaccessible. The Crown legislation and case-specific directions govern this application.⁸

The Inspectorate's general guidance on openness and its Customer Privacy Notice reinforce the ordinary expectation that material evidence can be understood and answered. While they do not override statutory security provisions, administrative convenience or the label "sensitive" is not, without the applicable legal justification, an answer to the specific disclosure requests.⁹

Fairness and the concrete prejudice to CCC

The planning-specific requirement is that a party knows the case it must meet and has a reasonable opportunity to adduce evidence and make submissions in response. *Hopkins Developments* and *Bramley Solar Farm* require attention to actual opportunity and material prejudice. CCC identifies that prejudice now and seeks an effective remedy before the hearing as procedural unfairness which materially prejudices a party is a recognised ground on which the resulting decision may be quashed on *challenge* (*Hopkins Developments* 62(ii)).¹⁰

Osborn v Parole Board explains that fairness protects effective participation as well as informed decision-making. The Inspector's confidence that an undisclosed report is sufficient to address matters of concern cannot, by itself, answer CCC's inability to challenge it.¹¹

Al Rawi distinguishes public access from a party's ability to know and answer evidence. Although that case concerned civil proceedings, not these express statutory inquiry powers, it reinforces why general casemanagement discretion is not a substitute for ensuring the lawful basis and safeguards of a closed-material procedure.¹²

⁵ Ministry of Housing, Communities and Local Government, Planning Practice Guidance, "Crown Development and Urgent Crown Development", para 056, reference ID 44-056-20250512 (12 May 2025).

⁶ Town and Country Planning (Crown Development Applications) (Hearings and Inquiries) Rules 2025, SI 2025/410, rr 13(3), 13(5)–(10), 20 and 27.

⁷ Town and Country Planning (Crown Development Applications) (Hearings and Inquiries) Rules 2025, SI 2025/410, rr 19(1)(i), 21(1), 21(5)–(7), 21(11), 21(14), 21(16)–(17), 27 and 28.

⁸ Planning Inspectorate, "Procedural guidance for Section 293D Crown Development applications" (1 May 2025), paras 4.3.4 and 5.4.1–5.4.4 (accessed 18 September 2026).

⁹ Planning Inspectorate, "Planning appeals procedural guide for appeals relating to applications dated on or after 1 April 2026", para 11.19.1; Planning Inspectorate, "Customer Privacy Notice" (updated 18 June 2026), Crown development section, under "We do not accept anonymous or confidential representations" (both accessed 18 September 2026). These general openness statements are relied upon subject to the specific statutory provisions for sensitive information.

¹⁰ *Secretary of State for Communities and Local Government v Hopkins Developments Ltd* [2014] EWCA Civ 470, [2014] PTSR 1145, [49], [62]; see also *R (Bramley Solar Farm Residents Group) v Secretary of State for Levelling Up, Housing and Communities* [2023] EWHC 2842 (Admin), [72], [98], [106].

¹¹ *Osborn v Parole Board* [2013] UKSC 61, [2014] AC 1115, [65]–[71].

¹² *Al Rawi v Security Service* [2011] UKSC 34, [2012] 1 AC 531, [10]–[14], [22]–[23]. The case concerned the court's powers in civil litigation, not the exercise of the express statutory planning-inquiry powers.

The prejudice arises now. Without usable modelling, plans and assessments, CCC cannot identify the appropriate expert disciplines, obtain informed opinions, test assumptions and calculations, prepare proofs or formulate conditions. It cannot identify matters to concede or narrow. Hearing-day questions, particularly on a very tight timetable, cannot replace that essential preparatory work for CCC's case. Nor can CCC reasonably be required to demonstrate the particular error which access to an unseen calculation or assessment may reveal.

Oxford County Council (OCC)'s 24 July response records that the redacted Transport Assessment and absent appendices prevented a fully informed assessment. National Highways also sought additional A34 information. CCC does not assume that no later exchanges occurred. It seeks those substantive exchanges and the resulting assessments, and confirmation of the consultees' current positions. Disclosure to a consultee alone does not cure CCC's separate inability to test the evidence.¹³

The gaps affect the claimed need and scale, visiting and accommodation, transport, lighting, ecology, energy, drainage and construction of an occupied IRC. They are linked: for example, the LCIA relies on transport conclusions whose underlying material CCC cannot verify. Annex 4 identifies the concrete lines of analysis prevented.

Access to withheld material could alter our client's position on the assessed need, the applicable Green Belt route, findings on living conditions or infrastructure, and the necessity or content of mitigation. Withholding can therefore affect both the planning outcome and the conditions proposed. CCC is not asserting that hidden evidence must be adverse. Our client is highlighting why the opportunity to test it matters.

Review of restrictions and any protective arrangements

The Home Office should review the requested material with its security adviser and seek any necessary reconsideration of the section 293H(7) direction. The review must distinguish information whose disclosure engages the statutory protection from separable planning evidence which can be disclosed. A document's inclusion in Annex A is not an answer to a request to review its treatment for this Inquiry.

For any continuing withholding, the applicant should supply a document- and passage-specific schedule identifying the current version, page or dataset, the planning proposition supported, the legal basis, the harm said to result from disclosure and why narrower redaction or authorised access would not suffice. Licensed-source and commercial-sensitivity descriptions are not automatically the section 293H(7) test. Current revisions should be mapped to Annex A rather than assumed to be either covered or excluded solely because their revision numbers differ.¹⁴

If particular protection remains justified, CCC will consider requesting properly authorised access for its legal representatives and relevant independent experts, subject to appropriate undertakings. Those terms must permit meaningful analysis, instructions and questioning. CCC does not consent in advance to lawyers-only access. Undertakings cannot override an extant direction, and any necessary authorisation must first be obtained.

The minimum fallback below requires the substantive evidence, not assurances that unseen reports support the application. A proposed open substitute must disclose enough methodology, assumptions, inputs, outputs, relevant plans and mitigation to permit effective testing. CCC seeks an opportunity to consider the adequacy of any disclosure before it is accepted. A brief summary is not an agreed substitute for the complete Lighting Assessment or EclA, nor for the analytical content of the demand and transport models.

The Inspector should distinguish any inspection needed to decide the proper handling of material from substantive reliance on it to determine the merits. CCC requests a reasoned ruling on whether and how each disputed proposition resting on withheld material can fairly be determined. The stated intention to hold no closed sessions makes that ruling particularly urgent.

¹³ Oxfordshire County Council, consultation response (24 July 2026), Transport Schedule, PDF pp 4–7, and Lead Local Flood Authority response; National Highways, consultation response (24 July 2026), request for additional information on the A34 Peartree Interchange. These are the dated public responses relied upon, not an assertion that no subsequent exchanges have occurred.

¹⁴ Annex A to the section 293H(7) direction, pp 4–6, including the entries for the Energy Strategy, Local Community Impact Assessment, Flood Risk Assessment, Habitats Regulations Assessment, Drainage and SuDS Strategy and appendices, Transport Assessment and Outline Environmental Management Plan.

If a section 321 procedure is now proposed, CCC seeks advance notice of its legal basis, open reasons and scope, and an opportunity to respond. The application must address whether an appointed representative is required, instructions, access, funding, testing of the evidence and open reporting. A special advocate is distinct from CCC's own counsel and is not automatically a complete cure. Such a change would reinforce the need to reconsider the timetable, not justify continuing unchanged.¹⁵

There should be no alternative informal reliance on undisclosed substantive assurances, private technical meetings or post-inquiry evidence. Site inspections and further evidence must be handled under the applicable Rules and any lawful security arrangements. Ordinary case administration and permitted unaccompanied observations are not challenged.¹⁶

Primary relief — postponement, disclosure and a revised timetable

CCC asks that the opening on 6 October 2026 and the substantive sittings presently listed for 6–9 and 12 October be vacated and relisted after proper disclosure and preparation and a new timetable and directions set. Rule 18(4) permits the Secretary of State to vary the Inquiry date; rules 16(3) and 28 address the timetable and further time. After opening, rule 21(17) permits adjournment. Where the necessary power lies with the Secretary of State, CCC requests immediate referral. Relisting must comply with the applicable notice requirements. The following directions are sought.¹⁷

- Within five working days of the direction, the applicant should serve the withholding schedule, disclose all requested material which can lawfully be supplied without further authorisation, identify any necessary application to vary a restriction, and confirm which unredacted versions have been supplied to the Inspector and consultees. If an item does not exist, is not held, has been superseded or is not relied upon, that must be stated, with any alternative evidence identified. An item-specific request for more time should not delay other disclosure.
- The competent decision-maker should promptly determine the continuing restrictions and necessary disclosure arrangements. There should then be a dated schedule for complete, usable disclosure, not an open-ended promise of later production. CCC should be given the chance to express its views before restricted access or substitute material is held sufficient. A revised hearing date should be settled by reference to that schedule and realistic preparation requirements.
- CCC should have at least 14 calendar days from receipt of substantially complete, usable disclosure to obtain advice and serve responsive evidence and amendments, with additional time where reasonably required by the material and a fair response period for the other parties before the affected evidence is heard. This is a proposed case-management minimum, not a fixed statutory entitlement. Even disclosure on 25 September would take that minimum period to 9 October, after the proposed opening, before allowing for responses.
- CCC seeks express permission to serve proportionate supplementary proofs and amendments arising from disclosure, question relevant applicant and consultee witnesses under rule 21(5), and seek recall where necessary. The schedule should allow proper expert review rather than require witnesses to adopt provisional assumptions about unseen material. Other parties should have a corresponding fair opportunity to respond.
- If necessary material remains undisclosed and no lawful procedure cures the prejudice, the applicant should not be permitted to establish the disputed favourable proposition through that untested material. The Inspector should require further directions or adjournment, or the applicant's withdrawal of reliance and identification of an adequate disclosed evidential basis. This is not an automatic refusal argument: whether the remaining evidence justifies permission is a matter for the inquiry itself.

Postponement is proportionate. The request concerns material already used to support the application, not an unrestricted search for new objections. A properly managed disclosure and preparation period will enable

¹⁵ Town and Country Planning Act 1990, s 321(5)–(9); Planning Practice Guidance, "Crown Development and Urgent Crown Development", para 056, reference ID 44-056-20250512, and paras 021–026, reference IDs 44-021-20140306 to 44-026-20140306. The latter explain the general planning procedure for national-security directions and appointed representatives.

¹⁶ Town and Country Planning (Crown Development Applications) (Hearings and Inquiries) Rules 2025, SI 2025/410, rr 22–25 and 27, including the distinct provisions for standard and recovered applications and for closed evidence.

¹⁷ Town and Country Planning (Crown Development Applications) (Hearings and Inquiries) Rules 2025, SI 2025/410, rr 16(3)–(4), 18(2)–(4), 21(17) and 28. Rule 18(4) applies the notice provisions in rr 18(2)–(3) to a varied inquiry date.

concessions and focused expert evidence and reduce the risk of fragmented hearings, repeated adjournments or procedural challenge. CCC recognises the applicant's asserted urgency, but that does not answer the specific prejudice or make the current timetable fair.

The ruling should address postponement, the material sought, each continuing restriction and the proposed cure for prejudice. Reasons are required which enable CCC to understand and respond to the decision on these important contested matters.¹⁸

Fallback if postponement is refused — the minimum evidential package

Without abandoning the primary application, our client seeks the following minimum disclosure, in a usable form, with the preparation safeguards below. This narrows the immediate request to the analytical evidence necessary for the disputed issues, rather than every ancillary operational detail. Annex 4 maps the requests to the documents and prejudice. Only irrelevant personal information and separately justified security detail whose removal does not prevent testing may remain excluded under this fallback. The minimum disclosure includes:

(a) **Demand modelling and need:** the assessments, model version, relevant source data, definitions, inputs, assumptions, outputs and sensitivity work actually relied upon to justify the additional 240 places, including operationally available capacity, detention duration, cohort restrictions, forecast period, resilience and the treatment of realistic alternatives. Native model/data files should be supplied where held and necessary to test the calculations. The actual basis of any withholding must be identified; CCC does not assume that demand modelling is covered by Annex A.

(b) **EIA screening and ecological evidence:** the unredacted EIA screening request and relied-upon supporting material, the July 2025 Screening Update and substantive information considered in the August 2025 and April 2026 reviews, together with any later material relied upon. This includes the full EclA, biodiversity metric and material supporting the HRA conclusions. The EclA is expressly withheld in full. The EIA screening reasons and updates are different documents, some already public; CCC does not assume that a full Environmental Statement exists and has been withheld.

(c) **Lighting:** the complete Lighting Assessment, "A-0000-ZZ-T-E-0005", and "65207763-SWE-XX-XX-T-J-0015 Ecology Lighting Review", both expressly withheld in full. The disclosed assessment must include the criteria, methodology, relevant lighting geometry, calculations, receptor results, spill/contour plans and mitigation needed to test effects on neighbours, inhabitants, landscape and ecology. General conclusions in the DAS or LVIA are not a substitute for that evidence.

(d) **Transport:** the unredacted analytical content of the Transport Assessment and appendices A–H, including traffic and junction-model inputs/outputs, directional flows, shift-change assumptions, parking accumulation, swept paths, crossing/safety material and the staff/visitor demand assumptions. This should include the substantive responses of OCC and National Highways, particularly on the A34, and their resulting positions.

(e) **Accommodation, welfare and community impacts:** the relevant dimensional plans and facility schedules for the proposed 400-person operation, usable room and shared-space capacity, accessibility and visiting arrangements, and the staffing/operational assumptions relied upon in the DAS, LCIA and Equality Impact Assessment. The substantive redacted content of the Engagement Report and relevant consultee responses must be supplied where relied upon. The 160-plus-240 capacity split is publicly stated; the issue is the suitability and operation of the accommodation, not an absence of that headline total.

(f) **Infrastructure, energy and construction:** the substantive redacted assessments and supporting material relied upon to demonstrate viable drainage, groundwater separation, the alternative outfall, pumping arrangements, thermal/ventilation/daylight performance and safe construction beside the occupied IRC, together with current consultee responses and mitigation commitments. CCC seeks the relevant assumptions, calculations, plans and results, not unrelated security-system specifications.

¹⁸ South Buckinghamshire District Council v Porter (No 2) [2004] UKHL 33, [36]; Dover District Council v CPRE Kent [2017] UKSC 79, [35]–[37].

Minimum preparation and hearing safeguards under the fallback

The minimum package should be disclosed promptly under a specified timetable, with any continuing restriction or missing item determined expressly. It is not acceptable to keep the substantive timetable unchanged on an expectation that adequate material may arrive during the Inquiry. The minimum is both substantive disclosure and a fair opportunity to use it.

If the 6 October opening is retained, CCC asks that it be confined to case management or genuinely severable matters which can fairly be heard on the disclosed evidence. No affected merits evidence should be taken until CCC has had the preparation period described above and a fair opportunity to serve responsive material and question witnesses. The Inspector should hear CCC before deciding that a matter is severable. These interrelated issues may leave no substantive business that can fairly proceed on 6 October.

The Inquiry must remain open, with further sitting dates if necessary. Its conclusion on 12 October should not be treated as fixed. Permission to amend, call appropriate responsive evidence, question or recall witnesses, and allow other parties to respond must be confirmed. If those safeguards cannot operate, the substantive hearing should be adjourned under rule 21(17).

Any remaining disputed proposition dependent on withheld evidence requires a specific lawful and fair procedure or an adequate disclosed evidential basis. It must not be treated as unchallenged because CCC cannot produce an expert calculation from material denied to it. CCC does not consent to informal closed consideration or to lawyers-only access as an automatic substitute for the minimum package.

The wider disclosure request in Annex 4 remains outstanding unless withdrawn expressly by our client. CCC's continued participation in the process, its meeting an unvaried deadline, or its consideration of protective arrangements is not to be taken as an acceptance that disclosure is adequate or that the prejudice has been cured. CCC requests a reasoned ruling on any part of the primary or fallback relief refused.

Urgent next steps

Please acknowledge receipt promptly and secure the ruling or interim directions requested above before the 25 September deadline. If an oral case-management discussion is needed, our client's legal representatives will make themselves available urgently. Waiting until 1 October for the first substantive consideration of these requests would leave the present preparation prejudice unaddressed.

We ask that the Pre-Inquiry Meeting on 1 October remains available to review compliance and settle the revised arrangements, with representatives of CCC, Garden Court Chambers and this firm attending as notified. This application and Annex 4 should be circulated to the applicant, Cherwell District Council and the other persons entitled to appear, and placed on the public application record. We are grateful for the Inspector's urgent consideration.

Yours faithfully,

Reed Smith LLP

Reed Smith LLP

Annex 4 — Disclosure requested and material prejudice

Schedule enclosed with CCC's application for postponement and disclosure. The primary request is the relevant unredacted material below. The final column identifies the minimum substantive content under the fallback, and does not constitute consent to the existing timetable or a waiver of the wider request. Annex A means the Secretary of State's sensitive-information schedule; its page references are PDF pages. Versions and dates are identifiers, not an assertion that the listed version remains the latest.

Material already supplied in a complete and usable form need not be duplicated, but its precise location and current status should be confirmed. For every remaining item the applicant should state whether it exists, is held and is relied upon, or give an item-specific legal basis for withholding. Any necessary protective arrangement must be authorised and must preserve effective expert analysis, instructions and questioning. No private addresses, identifying medical records, privileged legal advice or unrelated operational vulnerabilities are sought.

Reference / issue	Material requested and source	Minimum substantive disclosure and prejudice
D1. Need, scale and claimed benefits Issues (i), (ii) and planning balance	Planning Statement, paras 5.22–5.25 and 5.31; Statement of National Importance. The needs assessments, model and relevant dated operational-capacity/demand evidence relied upon for the additional 240 places, including source data, definitions, assumptions, outputs and sensitivity analyses. Include the final Phase 2 benefits calculation relied upon. Identify the actual basis of any withholding rather than assuming coverage by Annex A.	Minimum: a usable explanation and the analytical material needed to test the capacity constraint, bed-days, cohort restrictions, forecast horizon, resilience and treatment of alternatives. Supply native files where held and needed to test calculations. CCC cannot instruct a competent analysis or test scale from the assertion that a model supports expansion. Unrelated policy correspondence and privileged advice are not sought.
D2. Transport and sustainable access Issues (ii), (v), and (vi) for visits	Transport Assessment (11 March 2026, rev 04), redacted text/tables and appendices A–H: footpath; development plans; swept paths; crossing; road-safety audit/designer response; car-park accumulation; traffic diagrams; junction modelling. Include substantive material supplied to OCC and National Highways, including A34 Peartree information, and their later technical responses. Annex A, pp 1 and 5.	Minimum: relevant directional/total flows, shift and visiting assumptions, model inputs/outputs, parking accumulation and safety/access material. CCC cannot test network coverage, peak effects, parking or whether unchanged visitor trips are realistic without them. Access given to a consultee is not a substitute for CCC's expert access. Exact unrelated escort/security protocols can be considered separately if lawful protection is established.
D3. Accommodation, visiting and welfare Issue (vi), equality and planning balance	DAS, relevant internal/accommodation and visitor-building plans, facility schedules, operational/welfare passages of the LCIA, and the evidence relied upon in the Equality Impact Assessment and Engagement Report. Identify current revisions, room dimensions, occupancy and the capacity of shared facilities. Annex A, pp 2–4.	Minimum: sufficiently detailed dimensional and functional information to test privacy, shared/dual accommodation, accessible provision and routes, access to shared facilities, visiting and flexibility for vulnerability. Headline bed totals or room labels do not establish usable provision. CCC cannot obtain a properly informed welfare or accessibility opinion without this substance. Identifying medical records and unrelated security vulnerabilities are not requested.

Reference / issue	Material requested and source	Minimum substantive disclosure and prejudice
D4. Thermal performance, ventilation and daylight Issue (vi) and outline parameters	Withheld substantive material in the Energy Strategy P09 and the relied-upon technical specifications, modelling inputs/results and resilience, ventilation and shading assumptions. Annex A, p 4, identifies plant sizing, equipment layouts and infrastructure arrangements among the redactions. Related final assessment material is included insofar as relied upon.	Minimum: occupancy and operating assumptions, relevant room results, future-weather scenarios, security/shading effects and a usable explanation of capacity and resilience. Detailed favourable modelling exists; CCC does not allege its absence. Without the analytical substance, an expert cannot check whether compliance corresponds to the occupation and design to be authorised. Unrelated system/circuit details are not required merely because they appear in the same report.
D5. Drainage, groundwater and infrastructure Issue (vii), neighbours and environmental assessment	Relevant unredacted FRA and Drainage and SuDS Strategy sections/appendices, infiltration and seasonal groundwater evidence, fallback receiving connection and capacity, rights/approval evidence, pumping-station arrangements, exceedance and subsequent LLFA/utility responses. Annex A, p 5. Identify information not prepared or not held as such, rather than describing it as withheld.	Minimum: the analytical and spatial information needed to test infiltration viability, the alternative outfall and discharge arrangements, off-site effects and continuity of foul drainage. The difference between SA01 and SA02 results and the seasonal groundwater position require an informed response. Licensed-source descriptions alone do not explain why the substantive planning evidence cannot be disclosed. CCC cannot independently test deliverability through conclusions alone.
D6. Lighting, landscape, ecology and biodiversity Issues (iii), (iv), (vi) and environmental assessment	Entire documents in Annex A, p 1: A-0000-ZZ-T-E-0005 — Lighting Assessment; 65207763-SWE-XX-XX-T-J-0015 Ecology Lighting Review; 65207763-SWE-XX-XX-T-J-0010-C03 EcIA; 65207763-SWE-XX-XX-M-J-0001-C05 BNG Metric.xlsm; and relevant Planning Appendix C NE material. Include redacted landscape/parameter information, relevant later consultee reasoning and any competent-authority assessment. Annex A, pp 2–5, covers associated redactions.	Minimum: complete lighting and ecology assessments and the biodiversity calculation, with methodology, relevant geometry, receptor/spill/contour results, cumulative pathways and mitigation delivery. General DAS/LVIA summaries cannot enable testing of an entire withheld assessment. Any proposed exclusion of separable security detail or unnecessary protected-species location data must be justified without removing the material needed to analyse effects. This request does not presume adverse effects have been proved.

Reference / issue	Material requested and source	Minimum substantive disclosure and prejudice
D7. EIA screening, construction and assessment assumptions Issues (iv), (vi), (vii) and assessment requirements	The EIA screening request and supporting evidence; July 2025 Screening Update; final substantive information and correspondence considered in maintaining the screening outcome in August 2025 and April 2026; and any later relied-upon assessment. Include relevant redacted Outline Environmental Management Plan, construction, phasing, service and mitigation material for works beside the occupied IRC. Annex A, pp 4–6.	Minimum: the evidence necessary to understand and test the screened project, cumulative/human-health conclusions and relied-upon mitigation, together with the relevant construction exposure and continuity arrangements. This is distinct from the full EclA in D6. Some screening documents are already public; no duplicate is required. CCC does not assert that an Environmental Statement exists. Unsupported detail cannot be tested and appropriate conditions cannot be formulated without the underlying substance.