

Place and Regeneration

Development Management



Cherwell

DISTRICT COUNCIL
NORTH OXFORDSHIRE

Mark Jackson



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Please ask for: **Rob Duckworth**

Direct Dial:

Email:



Our Ref: **25/02050/PREAPP**

5 December 2025

Dear Mr Jackson,

Thank you for your pre-application enquiry received 7th August 2025 with regard to a proposed Outline Planning Application for the expansion of the IRC comprising the development of additional accommodation within the existing IRC, the expanded IRC would accommodate an additional 240 people (400 people in total).

I write further to our site meeting on 5th November 2025 attended by Rob Duckworth and yourself, apologies again for the time of the visit.

This report provides informal pre-application planning advice on the principle and key issues arising from an outline proposal to expand Campsfield House Immigration Removal Centre (IRC) to accommodate up to 400 detainees.

The advice is based on the information submitted with the pre-application enquiry, the planning history of the site and the current and emerging planning policy framework.

SITE DESCRIPTION

Campsfield House IRC occupies a former young offenders' institution on the southern side of Langford Lane between Kidlington and Begbroke and to the south of London Oxford Airport. The site extends to around 2.5–3 hectares and comprises a cluster of two and three storey institutional buildings, secure yards and ancillary structures within a secure perimeter fence.

The built complex is set back from Langford Lane behind existing vegetation and internal access roads. The wider corridor includes commercial and employment uses, including Oxford Technology Park and airport-related development, but the IRC complex remains a distinct, self-contained and heavily secured facility.

The nearest residential properties lie directly to the north on Evenlode Crescent and within Begbroke. The edge of Begbroke is 150–220 metres from the main buildings, separated by open fields, hedgerows and small woodland belts.

SITE CONSTRAINTS

Key constraints and designations relevant to the site include:

- Oxford Green Belt.
- Best and Most Versatile (BMV) agricultural land (20–60% likelihood and >60% likelihood tiles).
- Indicative location of a limited Green Belt review (Kidlington 1A).

- Proximity to London Oxford Airport and associated safeguarding zones (all development exceeding 15m to be consulted).
- NATS consultation for windfarm development (district-wide flag).
- Radon Class 3 area (3–5% of homes at or above the action level).
- Potential for ground contamination reflecting long-standing institutional use.
- Proximity to designated ecological sites in the wider area, including Rushy Meadows SSSI.
- Flood Zone 1 (low fluvial flood risk), subject to confirmation via FRA.

These constraints drive the need for a robust Green Belt case, careful attention to height and lighting, a sensitive landscape and ecology strategy and proportionate work on ground conditions and drainage.

PROPOSAL

The enquiry relates to an outline proposal to:

- Provide additional accommodation within the existing IRC site to increase capacity by approximately 240 detainees.
- Overall capacity of around 400 detainees once works are complete.
- Deliver the expansion through one or more new accommodation blocks and associated support space within the existing secure perimeter.
- Reconfigure and upgrade existing buildings as necessary, together with changes to internal circulation, parking and service yards.

The assessment below is based on the submitted drawings that show that the new accommodation would be of three to four storeys, broadly comparable in height to the existing main blocks, and that the secure perimeter would not extend beyond its current limits.

PLANNING HISTORY (SUMMARY)

The site has an extensive planning history as a detention facility. The following are of particular relevance:

- Change of use from young offenders' institution to an immigration detention facility in the early 1990s.
- A series of permissions for additional accommodation, plant and support buildings from the mid-1990s onwards.
- 08/01942/F – Multi-faith education and workshop unit (permission granted but not implemented).
- 12/01762/F, 13/00692/F, 14/00344/F – Single-storey and first-floor extensions to the boiler / plant room building and other minor extensions.
- 14/01778/F – Comprehensive expansion of the IRC, including a substantial two / three storey accommodation block and ancillary development to increase capacity by around 290 detainees (total capacity circa 566). The officer report concluded that, on balance, very special circumstances existed to justify inappropriate Green Belt development, and recommended approval subject to referral to the Secretary of State, conditions and a section 106 agreement. The application was withdrawn prior to been heard at Planning Committee.

APPRAISAL

Principle of development and Green Belt

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.

The construction of new buildings in the Green Belt is inappropriate development unless it falls within specific exceptions. Additional accommodation blocks for detention purposes do not fall explicitly within those exceptions. The proposal therefore constitutes inappropriate development by definition.

The expansion would also increase the intensity of use and built mass on the site, with associated effects on openness and on the Green Belt purposes of safeguarding the countryside from encroachment and preventing coalescence between Kidlington and Begbroke.

Inappropriate development is, by definition, harmful to the Green Belt. Substantial weight must be given to any harm to the Green Belt, including harm to openness and to the purposes of including land in the Green Belt.

Planning permission may only be granted if very special circumstances (VSC) exist which clearly outweigh the harm to the Green Belt and any other harm. Any future application will therefore need to be accompanied by a detailed Green Belt assessment and VSC statement.

The previous expansion scheme (14/01778/F) was considered by officers, on balance, to be supported by a VSC case at the time, having regard to national need for IRC capacity, strategic locational benefits, estate optimisation and the lack of realistic alternatives. That assessment was undertaken in a different policy and factual context and does not automatically apply but it is likely that similar factors will be in consideration with this revised case.

The current proposal has the potential to be more compact and less visually prominent than the 2014 scheme. A robust VSC case should therefore:

- Explain current national capacity requirements and operational needs.
- Set out options considered, including alternative sites and configurations.
- Demonstrate why Campsfield House is operationally necessary and why this level of expansion is the minimum required.
- Provide a justification for the footprint, height, massing and visual impact.

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 VSC case and the extent to which harm to openness is minimised.

Grey Belt

Grey Belt – policy context

Recent national policy updates introduce the concept of “grey belt” as a specific sub-category of land within the Green Belt.

In broad terms, grey belt is Green Belt land which:

- Is previously developed land (PDL), and/or
- Does not make a strong contribution to the main Green Belt purposes of:
 - checking the unrestricted sprawl of large built-up areas;
 - preventing neighbouring towns from merging; and
 - preserving the setting and special character of historic towns; and
- Is not subject to the most restrictive environmental or heritage designations that would, in any event, strongly limit development.

Government guidance expects local planning authorities to undertake a structured assessment of their Green Belt, identify any parts which meet this grey-belt definition, and then decide how such land should be treated in plan-making and decision-taking.

Where a site is properly identified as grey belt, national policy allows a more flexible approach to development, provided that:

- Development on that land would not fundamentally undermine the overall function of the Green Belt in the wider area;
- There is a demonstrable unmet need for the type of development proposed;
- The site is in a sustainable location; and
- Any additional criteria for the particular type of development (for example, for major housing schemes) are satisfied.

If all of those tests are met, development on grey-belt land may be treated as not inappropriate in Green Belt terms and can be considered in the normal planning balance, without the need to demonstrate very special circumstances.

Identifying grey belt – general approach

The emerging approach to grey belt is that it is a process, not a separate designation on the Policies Map. Authorities are expected to:

1. Divide the Green Belt into sensible assessment parcels.
2. Assess how strongly each parcel contributes to the key Green Belt purposes listed above.
3. Note any environmental or heritage constraints that would already rule out most forms of development.
4. Identify grey-belt parcels as those which do not strongly support the three key purposes and are not heavily constrained by other designations.
5. Consider whether bringing forward those parcels would undermine the function of the Green Belt as a whole in that area.

In practice, this usually means that:

- Heavily developed or degraded parts of the Green Belt (for example, large, long-established institutional or industrial complexes) are more likely to fall within grey belt.
- Open countryside, gaps between settlements and land closely related to historic cores or valued landscapes will continue to be treated as standard Green Belt with the usual high level of protection.

Potential grey-belt status of the Campsfield House site

The pre-application site comprises the established Campsfield House Immigration Removal Centre and its secure compound on Langford Lane. It contains substantial permanent buildings, hardstanding, security infrastructure and fixed services. As such, it is best described as previously developed land within the Green Belt.

The wider context includes London Oxford Airport and other large-scale commercial and institutional uses along the Langford Lane corridor. The site lies within the Green Belt gap between Oxford and Kidlington/Begbroke, and that gap clearly plays an important strategic role in preventing the coalescence of settlements and in controlling the outward growth of the urban area.

Against the grey-belt criteria, the key points are:

- Previously developed land: The Campsfield compound is clearly developed land. The built envelope is compact, long-established and visually associated with other developed 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 a wider open gap.
 - The site is not closely related to the historic core of Oxford or to a recognised historic town, so its specific role in preserving historic setting is limited.
 - On that basis, the developed 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 Sites of Special Scientific Interest or designated heritage assets, although there are sensitive ecological sites in the wider area. Detailed ecological assessment would still be required, but such designations do not automatically rule out grey-belt status for the compound.

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.

However, the surrounding undeveloped land within the same Green Belt gap is likely to make a slightly stronger contribution to preventing sprawl and coalescence. This site is heavily bounded by tall fencing and landscape planting and sits within an obvious enclosure. Whilst the open land would remain standard Green Belt, and as such, any proposal that extends materially beyond the established compound into open fields would face a much higher level of policy resistance, the existing characteristics would lead the site to be viewed lower grade Green Belt erring towards Grey Belt.

Assessment

The Campsfield IRC compound is a long-established previously developed parcel within the Green Belt. In principle, that is the type of land which could be considered grey belt through a formal Green Belt review process.

The open land around the compound performs a limited role in maintaining the gap between settlements and in securing the wider Green Belt purposes. That open land is likely to be treated as grey belt with reduced protections.

The Council has not, at this stage, adopted a detailed Green Belt/Grey Belt assessment that expressly identifies the Campsfield site as grey belt. Until that work is complete, the land remains Green Belt in the development plan and the normal Green Belt tests continue to apply.

Grey Belt considerations would nonetheless be a material consideration in decision-making. They can support an argument that intensification within the existing developed envelope is more acceptable in principle than outward expansion into currently open land, provided that the scheme is compact, well designed and supported by clear evidence of need.

In summary, 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.

Character, appearance and landscape

The site lies within the countryside gap between Kidlington and Begbroke and contributes to the separation of settlements. Policy ESD13 and saved Policy C15 seek to protect this separation and local landscape character.

The existing IRC buildings are visible in some mid-distance views but are relatively well contained by landform, vegetation and other development along Langford Lane. Additional built form will nonetheless introduce further bulk and height into the landscape.

Key design and layout principles should include:

- Keeping building heights to the minimum necessary for operational needs and airport safeguarding.
- Adopting a compact layout that remains tightly contained within the existing built envelope.
- Locating new accommodation to minimise its prominence in views from Langford Lane, Begbroke and the edge of Kidlington.
- Using materials and colours that reduce visual prominence and avoid a harsh, monolithic appearance.
- Providing a robust structural planting and landscape strategy around the site, including woodland belts and hedgerow enhancements, to help screen the complex and reinforce the Green Belt edge.

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.

Heritage

There are no designated heritage assets on the site itself. However, there are heritage assets in the wider area, including listed buildings and conservation areas within Kidlington and Begbroke.

A proportionate heritage assessment should accompany any future application, considering whether the increased scale and massing of development would have any effect on the significance or setting of nearby heritage assets. 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.

Residential amenity

The nearest residential properties are at a distance where direct impacts in terms of daylight, sunlight and overbearing presence are unlikely to be significant, provided building heights and massing are controlled and the tallest elements are set away from the most sensitive receptors.

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.

A detailed noise assessment and lighting strategy would therefore be needed. These should demonstrate acceptable noise levels at residential locations and minimal obtrusive light at residential boundaries.

Subject to appropriate layout, acoustic design and lighting controls, it is considered that significant adverse effects on residential amenity are unlikely. The perception of intensification will, however, be a matter of local concern and should be carefully addressed in consultation material and design choices.

During pre-application discussions it has been suggested that construction traffic could be routed via Evenlode Crescent (West) to avoid the main secure facility, thereby maintaining security and reducing interaction between construction activities and the operational IRC. However, this would direct HGVs and delivery vehicles past homes on Evenlode Crescent, where residents are already concerned about the impact of the development outside their properties. Any future application will therefore need to explain and justify the proposed construction access strategy, including consideration of alternatives, and demonstrate how adverse effects on local residential amenity will be minimised.

Highway safety, access and parking

The expansion to 400 detainees will increase staff numbers, visitor trips, service vehicles and potentially contractor movements. Oxfordshire County Council, as Local Highway Authority, will expect a detailed Transport Assessment (TA) and Travel Plan.

The TA should:

- Establish current baseline traffic flows and modal split.
- Assess trip generation for the expanded facility, including peak shift-change periods.
- Consider cumulative impacts with other development on Langford Lane and the wider corridor.
- Assess the capacity and safety of the site access and key junctions.

The Travel Plan should set out measures to encourage sustainable travel by staff and visitors, such as shuttle bus arrangements, cycle parking and facilities, car-sharing and EV charging provision.

A Construction Traffic Management Plan will also be required to manage construction traffic routing, timing and site logistics taking into consideration raised above regarding residential amenity.

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.

Flood risk and drainage

The site is understood to lie within Flood Zone 1 (low risk of fluvial flooding). Nonetheless, any increase in built footprint and hardstanding will require a Flood Risk Assessment and detailed surface water drainage strategy.

The drainage strategy should:

- Demonstrate that surface water runoff will be managed to greenfield rates or better.
- Incorporate sustainable drainage systems (SuDS) where feasible, such as swales, permeable paving or attenuation features.
- Include long-term management and maintenance arrangements.

Foul drainage capacity and connection arrangements must be agreed with Thames Water. If local networks are close to capacity, an impact study and any necessary reinforcement works are likely to be required.

Drainage matters are considered capable of being addressed through an appropriate strategy and conditions.

Ecology and biodiversity net gain

The site sits within a wider landscape that supports designated wildlife sites and protected species. Updated ecological surveys will be required, including habitat surveys and targeted work for species such as bats, breeding birds and reptiles.

A clear ecological impact assessment should then identify potential effects of the additional built form, lighting and activity, both on-site and in relation to nearby designated sites.

The scheme will need to deliver at least 10% Biodiversity Net Gain, in line with statutory requirements. This will require:

- A baseline habitat assessment and metric calculation.
- A habitat creation and enhancement strategy, likely including new woodland belts, species-rich grassland, hedgerow enhancements and nest / roost provision.
- Long-term management secured via a Landscape and Ecological Management Plan and appropriate legal mechanism.

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 and aviation

The site lies within the safeguarding area for London Oxford Airport. Any increase in building height or the use of tall cranes during construction will require consultation with the airport operator and, where relevant, aviation authorities.

Maximum building heights and crane heights should be defined early and agreed with the airport. A detailed external lighting strategy will also be required to avoid glare or distraction to pilots and to comply with aerodrome safeguarding requirements. A bird hazard management plan may be necessary to balance ecological enhancements with aviation safety. Subject to early and ongoing liaison, airport safeguarding issues are likely to be capable of resolution.

Ground conditions and contamination

Historic institutional use means there is a reasonable prospect of contamination on site. A Phase 1 desk study and Phase 2 intrusive investigation will be required to identify any contaminants and to assess risks to human health and controlled waters.

A remediation strategy and verification plan should be prepared where necessary. An unexpected contamination condition would also be appropriate.

Previous work on the site has also highlighted possible unexploded ordnance (UXO) risks. A UXO risk assessment and appropriate management measures should be in place before intrusive works commence.

These matters are typically dealt with by condition and are unlikely, in themselves, to be determinative.

Sustainable construction and climate change

Policies ESD1–ESD5 seek to secure low-carbon, climate-resilient development, including high standards of sustainable construction and the use of low and zero carbon technologies.

Given the scale and public sector nature of the project, the Council would expect:

- A Sustainability and Energy Statement demonstrating application of the energy hierarchy.
- A BREEAM assessment targeting at least “Very Good”, and preferably higher.

- On-site low and zero carbon technologies, such as heat pumps and photovoltaic panels, where feasible.
- Measures to support climate resilience, including solar control, sustainable drainage and appropriate specification of building fabric.

Strong performance in this area will attract positive weight in the overall balance.

Community engagement and public perceptions

Previous proposals to expand Campsfield House have attracted significant public interest and objection, including concerns about Green Belt policy, traffic, local image and the ethical and social dimensions of immigration detention.

While many of these issues sit outside the strict remit of planning, the level of public concern is a material consideration. Any new application should therefore be supported by:

- Early and transparent community engagement, including with Kidlington and Begbroke Parish Councils and local ward members.
- Clear explanatory material on the scale, nature and rationale of the proposal.
- A Statement of Community Involvement showing how feedback has influenced the design and operation of the scheme.

PLANNING BALANCE AND CONCLUSION

The key policy issue is the impact of the proposal on the Oxford Green Belt. The development would be inappropriate in Green Belt terms and would cause harm to openness and to the purposes of including land in the Green Belt, including the separation of Kidlington and Begbroke. Substantial weight must be given to this harm.

The use of an existing IRC site, the potential to deliver modern and more humane accommodation for an essential service, job creation, ecological enhancements, sustainable construction and other benefits will attract some positive weight. However, these factors, taken together, will only justify planning permission if they are shown to amount to very special circumstances which clearly outweigh the Green Belt harm and any other harm. There is a credible planning argument that the Campsfield compound sits towards the “Grey Belt” end of the Green Belt spectrum.

On the information available, officers consider that:

- The continued use of the site as an IRC is accepted and some further intensification within the existing secure perimeter is capable of being justified in principle.
- Impacts on landscape, character, residential amenity, transport, drainage, ecology and other technical matters appear capable of mitigation, subject to detailed design and robust supporting evidence.
- The decisive issue for any future application would be the strength of the very special circumstances case when set against the Green Belt harm and any residual impacts.

A carefully designed, more compact scheme limited to a total capacity of around 400 detainees, coupled with a clear and evidence-based VSC case, could be capable of support in principle. However, any recommendation would be finely balanced and subject to significant public and political scrutiny.

RECOMMENDATION (PRE-APPLICATION ADVICE)

Subject to the caveats set out above, officers consider that there is a realistic prospect that an outline or full application for an expansion of Campsfield House IRC to around 400 detainees could be supported in principle, provided that:

- The scheme is demonstrably more compact and less visually intrusive than the 2014 expansion scheme.
- A robust and up-to-date very special circumstances case is submitted, supported by clear operational evidence and an assessment of alternatives.
- The design, landscape, transport, drainage, ecology and sustainability strategies are of a high standard and respond fully to the constraints identified in this report.

SUGGESTED CONDITIONS FOR ANY FUTURE APPLICATION

At pre-application stage, the following headline conditions are likely to be appropriate for any future permission. These would need to be refined, justified and worded in full at application stage and may be supplemented or varied following consultee responses:

1. **Time limit** – Standard commencement period.
2. **Approved plans** – Development to accord with listed plans and documents.
3. **Phasing** (if applicable) – Phasing of construction and occupation, including any temporary arrangements.
4. **Materials and appearance** – Approval of external materials, finishes and colours.
5. **Site and finished floor levels** – Approval of existing and proposed levels and any earthworks or bunding.
6. **Landscaping and boundary treatments** – Detailed hard and soft landscaping scheme and long-term management.
7. **Tree protection** – Arboricultural method statement and protection measures for retained trees and hedgerows.
8. **External lighting** – Lighting strategy to protect amenity, ecology and aviation safety.
9. **Noise** – Noise assessment and mitigation for plant and external activities, with limits at noise-sensitive receptors.
10. **Construction Environmental Management Plan (CEMP)** – Including working hours, dust, noise, vibration and site management.
11. **Construction Traffic Management Plan (CTMP)** – Construction routing, timing, parking and wheel washing. Access via Evenlode Crescent (West) seems like the preferred route for construction traffic as it minimises risk to safety and security by bypassing the main compound. This option will result in serious impacts upon neighbouring residents though and consideration of timings and essential trips needs to be made.
12. **Highways and parking** – Provision and retention of access, internal roads, parking, servicing and turning areas.
13. **Cycle parking and EV charging** – Provision of secure cycle parking and EV charging infrastructure.
14. **Surface water drainage** – Detailed SuDS-based scheme and maintenance arrangements.
15. **Foul drainage** – Detailed foul drainage strategy and implementation.
16. **Ecology – CEMP (Biodiversity)** – Construction-phase ecological safeguards.
17. **Landscape and Ecological Management Plan (LEMP)** – Long-term management of habitats and planting.
18. **Biodiversity Net Gain** – Implementation of approved BNG plan and any off-site measures.
19. **Contamination** – Site investigation, remediation and verification, plus unexpected contamination.
20. **Unexploded ordnance (UXO)** – UXO risk assessment and management measures.
21. **Airport safeguarding** – Height limits, crane management and lighting in accordance with airport requirements.
22. **Sustainability and BREEAM** – Implementation of approved Sustainability and Energy Strategy and achievement of agreed BREEAM rating.
23. **Security and crime prevention** – Details of perimeter fencing, gates, CCTV and security infrastructure.
24. **Waste and recycling** – Provision and management of refuse and recycling facilities.

This list is indicative. The exact and any additional conditions, and whether they are pre-commencement or pre-occupation, will depend on the detailed design, consultee advice and national guidance on planning conditions at the time of any decision.

DISCUSSION OF CROWN PERMITTED DEVELOPMENT RIGHTS

Works to renovate the existing site have been undertaken in the past year. It was agreed that new perimeter fencing required formal approval and retrospective planning permission (25/01559/F was approved for these works in August. Officers accepted that other minor development on the site complied with the relevant classes of Part 19 of Schedule 2 of the GPDO. Whether the rebuilding of an accommodation block complied with Class A of Part 19 was however questioned by officers. A subsequent legal opinion that you provided has been discussed with the Council's Legal Team. The wording of the legislation is ambiguous and in the absence of any relevant case law, we were unable to come to a

definitive conclusion as to whether the works were permitted development, although it was recognised that there was some merit in the argument put forward by the KC.

Although you may want to consider submitting a certificate of lawfulness (we would consider getting our own legal opinion from a barrister) because the works improved the appearance and functionality of the accommodation block and resulted in a structure of almost identical proportions to the original, it is currently considered unnecessary for the Council to pursue this matter any further.

This advice above is offered without prejudice to the formal determination of any subsequent planning application by the Local Planning Authority and, where applicable, the Secretary of State.

Yours faithfully,

Rob Duckworth

CONSULTATION RESPONSES, CONSTRAINTS AND RELEVANT POLICIES

Consultation Responses:

Oxfordshire County Council – Highways

Overall stance: No explicit objection at pre-app stage; expects a full Transport Assessment and strong emphasis on sustainable travel and mitigation.

Key points:

- Access via Evenlode Crescent East
 - Not expected to be adopted highway.
 - Must provide safe and convenient pedestrian and cycle access on and off the site.
 - Currently no footways on Evenlode Crescent – OCC want new pedestrian facilities along it in the interests of pedestrian safety and sustainable travel. *During Site visit footpath installed and road improved.*
 - Traffic calming may be required because of the straight alignment.
 - Junction with Langford Lane must accommodate the future cycle route along Langford Lane.
- Active travel
 - Site is well connected by existing/planned cycle routes.
 - A new cycle route is planned along the south side of Langford Lane (linked to the adjacent technology park).
 - If this development comes forward before the tech park scheme, the IRC scheme will be expected to deliver the necessary sections of that cycle route to ensure safe access.
- Public transport
 - Bus stops on Langford Lane are within comfortable walking distance.
 - There is currently no safe crossing point between the north and south side bus stops; OCC expects a suitable crossing across Langford Lane (to be delivered under a S278 agreement).
 - Depending on scale and staffing, OCC may seek a contribution towards bus services.
- Parking
 - Covering letter refers to up to 312 parking spaces plus dedicated visitor spaces – OCC wants clarification whether 312 includes or excludes visitor parking.
 - No specific standard for an IRC in OCC guidance; parking should be:
 - § Only as much as is operationally necessary (plus reasonable staff provision).

§ Justified in the Transport Assessment with reference to expected modal split.

- Cycle parking should be secure, covered, convenient and provided at a generous level to anticipate increased cycling.
- EV charging infrastructure expected in line with Oxfordshire's EV Infrastructure Strategy.
- Trip generation / Transport Assessment / Travel Plan
 - A full Transport Assessment is required, covering:
 - § Scale of development and staff numbers.
 - § Travel modes and shift patterns.
 - § Traffic impact on the local highway network and key junctions.
 - A Travel Plan is expected to encourage sustainable modes for staff and visitors.
 - OCC points to its "Decide and Provide" TA guidance and Travel Plan / parking standards as reference documents.

Oxfordshire County Council – Lead Local Flood Authority (LLFA)

Overall stance: No bespoke objection; sets out standard expectations for major development.

Key points:

- The development is "major" and must be supported by:
 - A Surface Water Management Strategy using Sustainable Drainage Systems (SuDS).
 - A site-specific Flood Risk Assessment (FRA) (development area >1ha in Flood Zone 1).
- SuDS must:
 - Manage runoff rates and volumes.
 - Provide water quality, biodiversity and amenity benefits.
 - Follow national Non-Statutory SuDS Standards and OCC's "Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire".
- Expectation that:
 - Existing drainage features and overland flow routes are retained and, where possible, enhanced.
 - The surface water strategy sets parameters for each parcel/phase even at outline stage, with space allowed for shallow conveyance and attenuation features throughout the site.

Oxfordshire County Council – Archaeology

Overall stance: No objection subject to conditions.

Key points:

- The site lies within an area of archaeological interest and potential:
 - Cropmarks c. 550m to the south-east indicate probable late prehistoric settlement (Iron Age pottery found in evaluation).
 - Extensive geophysical survey to the west recorded a possible Roman stone building and features of agricultural activity.
- OCC recommends a staged programme of archaeological investigation secured by condition, including:
 - Pre-commencement approval of an Archaeological Written Scheme of Investigation (WSI) by a professional archaeological organisation.
 - Implementation of the agreed WSI and recording of archaeological remains during construction.
 - Post-excavation work and dissemination as appropriate.

Cherwell District Council – Ecology

Overall stance: No objection in principle; flags BNG and survey requirements, and anticipates a mix of on-site and off-site BNG.

Key points:

- Biodiversity Net Gain (BNG)
 - Development will be subject to the statutory Biodiversity Gain

- Condition (pre-commencement).
 - Minimum 10% BNG must be demonstrated.
 - For the future application, the applicant must submit:
 - § A Biodiversity Net Gain report.
 - § Completed Statutory BNG metric.
 - § BNG plans/drawings in UKHab format (to scale) with habitat condition assessments.
 - § A management plan showing how habitats will reach their target condition.
- On-site vs off-site provision
 - Officer notes the site is unlikely to have enough space to deliver a full 10% gain on site:
 - § Currently vegetated areas will be lost to car parking.
 - § The small enhancement area in the north-west is not sufficient alone.
 - Off-site units/credits are therefore likely to be required; applicant should:
 - § Explain type and number of units and why off-site is justified.
 - § Indicate where off-site units might be sourced.
 - Green roofs/walls are seen as positive and should be maximised.
- Ecological surveys / EclA
 - A full Ecological Impact Assessment (EclA) will be required.
 - The site lies in the amber risk zone for great crested newts – GCN must be fully considered.
 - Good connectivity to woodland, hedgerows and the River Cherwell; bats are a key receptor:
 - § A bat-sensitive lighting plan is encouraged early (ILP/BCT GN08/23).
 - Parts of the site are recorded as Possible NERC Act Section 41 Priority Grassland Habitat:
 - § Vegetation surveys needed at the correct season to confirm habitat types and conditions.
- Enhancements
 - Expectation for species enhancements such as bat and bird boxes, hibernacula, bee bricks, etc.
 - These should be designed into the scheme and shown on plans.

Cherwell District Council – Environmental Health

Overall stance: No objection in principle; requests targeted technical work at application stage.

Key points:

- Noise
 - A noise impact assessment will be required to show that any new external plant does not adversely affect nearby residents.
 - New plant should be designed so that the rating level is at least 5 dB(A) below the existing background level (LA90) at the nearest noise-sensitive properties.
- Air quality
 - An air quality assessment is not required.
- Contaminated land
 - A formal contaminated land assessment is not required for this proposal based on current information.
- Lighting
 - If new external lighting is proposed, an obtrusive light assessment may be required.
 - Assessment should ensure light spill/trespass at residential properties is acceptable and consistent with ILP GN01/20 – Guidance Notes for the Reduction of Obtrusive Light.
- Odour
 - No concerns; no specific comments.

Cherwell District Council – Building Control

Overall stance: Procedural comment only; not a planning objection.

Key points:

- Government (Crown) buildings are exempt from the procedural requirements of the Building Regulations due to Crown immunity.
- However, the substantive technical requirements of Building Regulations still apply and will need to be met through the design and construction process.

Flood Risk: Please delete or amend as relevant The site is within Flood Zone 1 which is the zone of lowest flood risk. The Environment Agency has produced advice for applicants and agents about assessing flood risk in the planning process, and this can be viewed online at: <https://www.gov.uk/flood-risk-assessment-for-planning-applications>. You should have regard to this advice when preparing your application.

The Environment Agency also offers a pre-application service, details about which are available online at: <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>

Drainage: Please delete or amend as relevant You need to consider foul and surface water drainage when designing your proposals. In respect of foul drainage, you should first seek to connect to the public sewer network. You can contact Thames Water for further advice about this; information about their pre-application service is available online at: <https://developers.thameswater.co.uk/commercial-building-works/water-supply/disconnections/pre-application-help-and-advice>.

Only if a connection to the public sewer network is not feasible should you then consider other foul drainage options. The Environment Agency would be consulted on any planning application that proposes non-mains foul drainage. If you are proposing non-mains foul drainage, you should submit a completed Foul Drainage Assessment Form with your planning application. This form can be viewed online at: <https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1>

In respect of surface water drainage, wherever possible surface water should be drained within the site using Sustainable Drainage Systems (SuDS). Technical Standards for the design, maintenance and operation of SuDS can be viewed online at: <https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards>

In some cases the Water Authority may adopt SuDS which meet the legal definition of a sewer. Water UK has published [Design and Construction Guidance](#) which contains details of the water sector's approach to the adoption of SuDS. If you wish to explore the option of the Water Authority adopting SuDS, you will need to ensure the SuDS are designed in accordance with the Guidance.

In addition, you should refer to the guidance published on [Oxfordshire County Council's Flood Toolkit](#) concerning surface water drainage, and in particular the detailed guidance provided in the "Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire".

Relevant Planning History:

The site has an extensive planning history as a detention facility. The following are of particular relevance:

- Change of use from young offenders' institution to an immigration detention facility in the early 1990s.

- A series of permissions for additional accommodation, plant and support buildings from the mid-1990s onwards.
- 08/01942/F – Multi-faith education and workshop unit (permission granted but not implemented).
- 12/01762/F, 13/00692/F, 14/00344/F – Single-storey and first-floor extensions to the boiler / plant room building and other minor extensions.
- 14/01778/F – Comprehensive expansion of the IRC, including a substantial two / three storey accommodation block and ancillary development to increase capacity by around 290 detainees (total capacity circa 566). The officer report concluded that, on balance, very special circumstances existed to justify inappropriate Green Belt development, and recommended approval subject to referral to the Secretary of State, conditions and a section 106 agreement. The application was withdrawn prior to been heard at Planning Committee.

Policy: Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan in Cherwell comprises the Cherwell Local Plan 2011-2031 Part 1, and the saved polices of the Cherwell Local Plan 1996. The policies considered most relevant to your proposal are:

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

- *PSD1 – Presumption in favour of sustainable development.*
- *ESD1–ESD5 – Climate change, sustainable construction and renewable energy.*
- *ESD6, ESD7 – Flood risk and sustainable drainage.*
- *ESD10 – Protection and enhancement of biodiversity and the natural environment.*
- *ESD13 – Local landscape protection and enhancement.*
- *ESD14 – Oxford Green Belt.*
- *ESD15 – The character of the built and historic environment.*
- *SLE4 – Improved transport and connections.*

CHERWELL LOCAL PLAN 1996 SAVED POLICIES (CLP 1996)

- *C15 – Prevention of coalescence of settlements.*
- *C28, C31 – Design, layout and compatibility with residential areas.*
- *ENV1, ENV12 – Pollution control and contaminated land.*

CHERWELL LOCAL PLAN REVIEW 2042

The Council is preparing the Cherwell Local Plan Review 2042. 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.

OTHER MATERIAL CONSIDERATIONS

The National Planning Policy Framework (2019) is a material consideration which should be afforded significant weight. Other material considerations include:

- NPPF
- Planning Practice Guidance (PPG)
- Environment Act 2021 provisions on Biodiversity Net Gain (BNG).

You should be aware of the following matters/issues/designations:

- § If the Highways Authority need to be involved contact www.highways.gov.uk. Useful link: <http://www.highways.gov.uk/publications/planning-protocols-for-planning-and-development>
- § You may need to consider the effect on protected species when developing your proposals. Further information may need to accompany your application including a phase 1 survey to identify habitats present and features likely to be used by protected species and any further detailed survey reports for any individual protected species should these be necessary. In order to assist you in this you should refer to the Standing Advice prepared by Natural England (link below). This 'standing advice' will help in assessing if there is a reasonable likelihood of protected species being present and if so the relevant survey and mitigation requirements. This advice will be a material consideration in the determination of your application.
<http://www.naturalengland.org.uk/ourwork/planningdevelopment/spatialplanning/standingadvice/advice.aspx>

In this case I have considered the standing advice and note that there is a reasonable likelihood of protected species being present within the site due to xxxx I would, therefore, advise you to submit a phase 1 survey/bat and barn owl survey/great crested newt survey. Failure to do so could result in your application being refused as the Council will not be able to properly assess the impact of the development on protected species.