

## Report

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### Habitats Regulations Assessment Screening

### Campsfield IRC

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C03	17.02.26	Minor amends	CF	CF	CF
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## 1 Introduction

### 1.1 Purpose

This Habitats Regulations Assessment (HRA) Screening report has been prepared by Sweco for The Home Office and relates to development at Campsfield Immigration Removal Centre (IRC), Kidlington, Oxfordshire, OX5 1RE, for which outline planning permission is sought from the Secretary of State pursuant to S239D of the Town and Country Planning Act 1990.

The purpose of this HRA Screening is to compile all relevant and necessary information required to present to the Secretary of State to determine whether 'the development' may impact on a European site so that the Competent Authority has sufficient means to conclude their own HRA. European sites are those designated under the Conservation of Habitats and Species Regulations 2017 (as amended), including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar sites.

### 1.2 Site Description

The site is situated to the northwest of Kidlington (NGR: SP 47476 14611).

The site is divided into two separate sections: a western fenced area of grassland, permanent and temporary structures with associated hardstanding within the central main area, and to the north another grassland field with garages adjacent to the existing entrance road and car park.

Within the local area surrounding the site are Oxford Airport to the north, industrial developments to the east, and agricultural land to the south and east.

The indicative site and survey area boundaries are shown in Figure 1.1 below:



**Figure 1.1.** Indicative Development Area (red line).

*Map data: Imagery @2026 Airbus, Maxar Technologies, Map data @2026.*

### 1.3 Ecological Background

An ecological desk study, UK habitat classification survey and protected species scoping survey was carried out in September 2022 as part of the Preliminary Ecological Appraisal [1].

Natural England was consulted, via the Discretionary Advice Service, with regards to the HRA and if the screening assessment report herein was sufficient to rule no likely significant effects. Natural England provided no additional comments on the HRA (see Appendix A).

### 1.4 Requirement for Habitats Regulations Assessment

The European Directive (92/43/EEC), termed the Habitats Directive, was introduced to protect and enhance species and habitats of nature conservation importance at the European level.

The Habitats Directive applies the precautionary principle to protected areas: plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of European sites. The first stage of HRA is screening, the purpose of which is to establish whether the plan or project will have any Likely Significant Effects on any European site. For this purpose, and as a result of case law, 'likely' means 'possible'.

If the Competent Authority determines that there are no Likely Significant Effects (including 'in combination' effects from other plans or projects), then no further assessment is necessary, and the plan or project can, subject to other issues, be taken forward.

If, on the other hand, the Competent Authority determines that there are Likely Significant Effects, or there is reasonable doubt, then the HRA must continue to the more detailed "Appropriate Assessment" second stage. The HRA process is iterative, and the Competent Authority may consider additional incorporated mitigation following screening, consideration of which is part of the Appropriate Assessment. Compensatory measures imply that adverse effects cannot be avoided or mitigated and must not be considered during the initial stages of the Appropriate Assessment.

If the Appropriate Assessment cannot conclude without reasonable scientific doubt that there will be 'no adverse effects on the integrity' of European sites, then the HRA proceeds to a third stage seeking alternative solutions with no or reduced adverse effects. If no suitable alternatives can be found, potentially damaging plans or projects can be permitted only if there are 'Imperative Reasons of Overriding Public Interest' (IROPI) as to why they should go ahead, and in such cases compensatory measures are obligatory to ensure overall integrity of the network of European sites is maintained.

### 1.5 Limitations and Expectations

The purpose of this HRA Screening is to support the outline planning application. This confirms that the Habitats Regulations apply to applications for the approval of reserved matters where necessary to ensure that the HRA process has been followed.

This means that if the HRA process is not followed for an application for outline planning permission then the HRA would need to be undertaken when reserved matters were considered for approval. In the case of the current application for outline planning permission, the HRA process is being followed. Provided the applications for the approval of reserved matters are in accordance with the scope of the outline planning permission, it should not be necessary for any further HRA process to be undertaken.

## 2 Description of the Development

### 2.1 The Development

The development comprises 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.

Indicative plans, as shown on Edgingtons Architects drawing 243925-15206-EDG-ZZZ-XX-DR-A-0012-S2-D0100 and 243925-15206-EDG-ZZZ-XX-DR-A-0013-S2-D0100 (see Drawings section), detail an expanded car park within the northern section, the refurbishment of the gate house and creation of a command centre along with two other buildings within the central area, and the construction of a new main block within the eastern section.

In order to facilitate the development, the following enabling works are expected to be required:

- Complete demolition of temporary buildings and garages
- Partial demolition of gate house building
- Vegetation clearance and tree felling

### 2.2 Operational Phase

The site is currently operating as an IRC, and the development comprises the extension of the existing facilities with associated infrastructure to support the daily operations.

### 3 HRA Methodology

#### 3.1 Habitat Regulations Assessment Guidance

The HRA Screening process undertaken by Sweco has been developed with reference to the following guidance:

- The Conservation of Habitats and Species Regulations 2017;
- EU Directive 92/43/EC on the Conservation of Natural Habitats and Wild Fauna and Flora;
- DEFRA (2023) Guidance: Habitats regulations assessments: protecting a European site [3];
- DEFRA (2021) Guidance Duty to protect, conserve and restore European sites [4];
- Natural England (2015) Guidance Conservation objectives for land-based protected sites in England: how to use the site advice [5]; and
- EC (2001) Assessment of plans and projects significantly affecting National Site Network sites: methodological guidance on the provisions of Article 6(3)and (4) of the Habitats Directive 92/43/EEC.

#### 3.2 Habitat Regulations Assessment Stages

The HRA process comprises three main stages and establishes whether the proposal:

- Is directly connected with or necessary for management of the European designated site;
- Is likely to have a significant effect on a site; and
- Will have an adverse effect on the integrity of the site.

If the assessment cannot ascertain that the proposal would not adversely affect site integrity and the Competent Authority still wish to consent the proposal, a consideration of alternative solutions is required [6]. If no alternative solutions are available, a proposal may be carried out for Imperative Reasons of Overriding Public Interest as indicated by Article 6(4) of the Habitats Directive. Compensatory measures 'should be considered only when the application of other safeguards, such as mitigation measures, is not sufficient' [7].

Guidance [3] identifies assessment required under the following stages:

- **Screening likely significant effects:** the first stage of the HRA process involves checking if a proposal is likely to have a significant effect on the conservation objectives of a European site. Mitigation measures to avoid or reduce any such effects cannot be taken into account at the screening stage. However, any measures that forms part of an application which can reasonably be regarded as 'standard or best practice', or is provided as a legislative

requirement to protect the wider environment and not specifically for European sites, and where there is a high degree of certainty the measure will be effective in avoiding impact on the European site, can be considered at this stage. If there will be no likely significant effect then it is not necessary to go through the appropriate assessment or derogation stages. The precautionary principle will be used in assessing whether effects may be significant, where there is any uncertainty the potential effects will be examined in greater detail;

- **Detailed Appropriate Assessment and ascertaining the effect on site integrity:** where there are potential significant effects more detailed information will need to be considered to determine the impact of these effects on the European sites qualifying features and hence site integrity and conservation objectives. This stage avoidance and mitigation measures should be taken into account; and
- **Derogations stage:** Stage Three is when no adverse effect on site integrity (AESI) cannot be ascertained. It examines alternative ways of achieving the objectives of the project or plan, that may avoid an AESI on the European site. Guidance [6] indicates that all alternatives have to be analysed. This could involve alternative locations or routes, different scales or designs of development, or alternative processes. Following this, where no alternative solutions exist and where adverse effects remain, an assessment is undertaken of the Imperative Reasons of Overriding Public Interest (IROPI) to determine whether a project or plan should proceed. Where it is determined that there are IROPI it would be necessary to design, implement, manage and monitor compensation measures “to offset the negative impact of a project and to provide compensation corresponding precisely to the negative effects”.

This report covers the initial Screening assessment.

## 4 Identification of European Sites and Characterisation

### 4.1 European Sites Requiring Assessment and their Qualifying Features

Projects may have spatial implications which can have further reaching effects than those predicted to fall within the development footprint. Specifically, it is recognised that distance between a proposed works area and a designated site in itself is not a definitive determinant as to the likelihood of an impact occurring or its severity. Site variables such as prevailing wind conditions, surface and groundwater flow direction, noise, and air quality impacts both during and post construction, and potential recreational impacts caused by the development, will all have an influence on the relative distance at which an impact can occur.

Additionally, the mobile nature of qualifying species such as birds must also be considered, since an adverse effect on the qualifying species of a site when using areas of habitat outside of the designated sites, may still result in a significant adverse impact upon a site. Hence, works some distance away from a European site could still have effects on the site and, therefore, need to be considered as part of the screening process [8].

An impact zone of 10 km, based on best professional judgement, has been used to identify potential sites affected by the development, of which there is one: Oxford Meadows Special Area of Conservation (SAC), located approximately 3.9 km south from the site boundary (at its closest point).

A Magic Map Search is included along with the site check results as Appendix B. Table 4.1 below presents the site and its qualifying features.

**Table 4.1. Internationally Designated Sites and their Qualifying Features**

European Site	Complete List of Qualifying Features
Oxford Meadows SAC	<p><b>Annex I habitats</b> Lowland hay meadows</p> <p><b>Annex II species</b> Creeping marshwort (<i>Apium repens</i>)</p>

### 4.2 Conservation Objectives

The screening for likely significant effects will consider the implications of the proposal in view of the site's conservation objectives which have been listed in Table 4.2 below.

**Table 4.2. Internationally Designated Site Conservation Objectives**

<p><b>Oxford Meadows SAC. Dated 26/09/2014.</b></p> <p><i>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</i></p>
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**Oxford Meadows SAC. Dated 26/09/2014.**

- *The extent and distribution of qualifying natural habitats and habitats of the qualifying species*
- *The structure and function (including typical species) of qualifying natural habitats*
- *The structure and function of qualifying species*
- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely*
- *The population of each of the qualifying species, and,*
- *The distribution of the qualifying species within the site.*

## 5 Identification of Likely Impacts

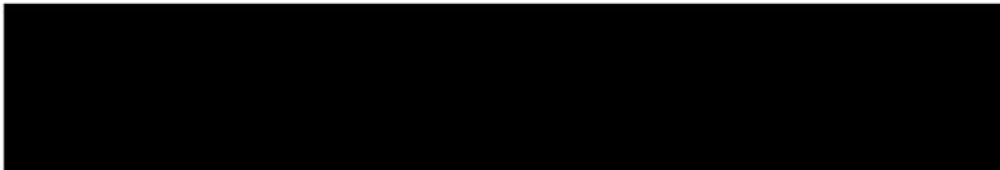
### 5.1 Assessment of potential impacts

The evidence relating to potential impacts can be wide ranging; therefore the scale of the existing issues and the potential for such impacts to increase as a result of the developments are carefully considered. It is also important to factor in any cumulative and synergistic effects to the assessment process as well as the duration, frequency and reversibility of any such impacts.

Direct and indirect impacts such as loss of habitat, loss of supporting habitat, impacts to water quality, changes to flow rates, disturbance and recreational impacts are considered and are discussed further below.

Following the *People over Wind & Peter Sweetman v Coillte Teoranta* (Case C-323/17), HRA Screening must not take account of any avoidance or mitigation measures that have been integrated into the project specifically to protect SPA or SAC features. A precautionary approach must be taken in considering whether the project is likely to have significant effects on site features, both alone and in combination with any other relevant plans and projects that are likely to have residual effects on the site.

### 5.2 Oxford Meadows SAC



Hydrological linkages between the application area and this SAC are absent and therefore hydrological impacts due to increased water levels, pollution and nutrient neutrality are not anticipated.

The site is currently in use as an IRC. The proposed increase in holding capacity is not predicted to have potential for a large impact on air quality (from movement of vehicles including staff, visitors and detainee) over and above the current baseline of the operational site. Additionally, the distance of the site from the SAC (3.9km) is also considered large enough that any air quality impacts (resulting from vehicle movements of staff, visitors and detainee) from the site are unlikely to reach it. In addition to this, the qualifying features of the designated sites are not highly sensitive to air quality impacts, as shown on the Air Pollution Information System [9]. Therefore, no likely significant effects are identified.

As the development is an immigration removal centre, no recreational impacts (i.e. from an increased number of visitors to the European site as may be anticipated with a residential development) are anticipated.

## 6 In-Combination Effects

Article 6(3) of the Habitats Directive requires that HRA Screening of projects should include a consideration of other plans or projects which could affect site integrity in-combination with the proposal under assessment.

As there will be no likely significant effects on the designated sites due to the development there can be no residual effects to consider in combination.

## 7 Conclusion



There is no hydrological connectivity between the site and the SAC and therefore no likely significant effects are identified.

No recreational impacts are anticipated due to the nature of the development as an IRC.

The development is not predicted to pose a significant impact on air quality based upon the nature of the development, the distance of the site from the SAC and the fact that the qualifying features of the designated sites are not highly sensitive to air quality impacts.

Considering all of the above, the conclusion of this HRA Screening is that the development will not have a likely significant effect on the Qualifying Features of the Oxford Meadows SAC.

## 8 References

- [1] Sweco, "Preliminary Ecological Appraisal: Campsfield IRC, Kidlington. Reference 65207763-SWE-XX-XX-T-J-0001," 2022.
- [2] Sweco, "Ecological Impact Assessment: Campsfield IRC, Kidlington. Reference 65207763-SWE-XX-XX-T-J-0010-C04," 2026.
- [3] DEFRA, "Guidance: Habitats regulations assessments: protecting a European site," 2023. [Online]. Available: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>. [Accessed March 2026].
- [4] DEFRA, "Guidance Duty to protect, conserve and enhance European sites," 2021. [Online]. Available: <https://www.gov.uk/guidance/duty-to-protect-conserve-and-restore-european-sites>. [Accessed March 2026].
- [5] Natural England, "Guidance Conservation objectives for land-based protected sites in England: how to use the site advice," 2015. [Online]. Available: <https://www.gov.uk/guidance/conservation-objectives-for-land-based-protected-sites-in-england-how-to-use-the-site-advice>. [Accessed March 2026].
- [6] DEFRA, "Habitats Directive: guidance on the application of Article 6(4) Alternative solutions, imperative reasons of overriding public interest (IROPI) and compensatory measures," August 2012. [Online]. Available: <https://assets.publishing.service.gov.uk/media/5a796c5ce5274a2acd18cb66/habitats-directive-iropi-draft-guidance-20120807.pdf>. [Accessed March 2026].
- [7] European Commission , "Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC. Clarification of the Concepts of : Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the commission," 2007.
- [8] Department for Communities and Local Government, "Planning for the Protection of European Sites: Appropriate Assessment Guidance for Regional Spatial Strategies and Local Development Documents.," 2006.
- [9] Air Pollution Information System (APIS), "APIS App," [Online]. Available: <https://www.apis.ac.uk/app>.

## **Drawings**

Edgingtons Architects drawings:

243925-15206-EDG-ZZZ-XX-DR-A-0012-S2-D0100: Indicative Site Plan - Sheet 1

243925-15206-EDG-ZZZ-XX-DR-A-0013-S2-D0100: Indicative Site Plan - Sheet 2





243925-15206-EDG-ZZZ-XX-DR-A-0012-S2-D0100

MATCH LINE



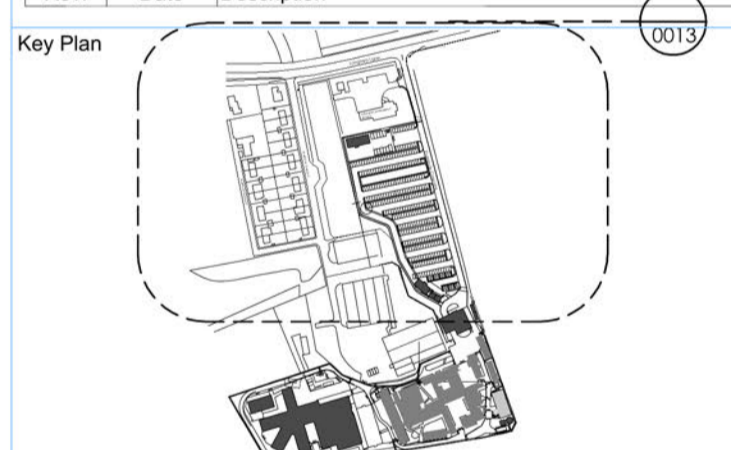
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Do not scale from drawings. Verify all dimensions on site prior to construction. This drawing is to be read in conjunction with all relevant documents and drawings. Report all discrepancies to MoJ immediately.  
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Notes

— Denotes area of IRC Campsfield



Rev.	Date	Description
P03	05.09.2025	Stage 2 Final Issue
P02	06.06.2025	Stage 2 Issue
P01	18.04.2025	First Issue



Project Status  
RIBA Stage 2

Client  
**Home Office**

Project  
Campsfield IRC

2 Marsham Street, London, SW1P 4DF, United Kingdom

Project Description / Site  
Campsfield IRC

Project Address  
Kidlington, Oxfordshire  
OX5 1RE

Building Type

Drawing Title  
Indicative Site Plan - Sheet 2

<b>EDGINGTONS</b> <small>ARCHITECTS</small>	Originator Logo	Drawn By	KS	Date	20.03.2025
		Checked By	MSR	Date	31.03.2025
		Approved By	MSR	Date	31.03.2025

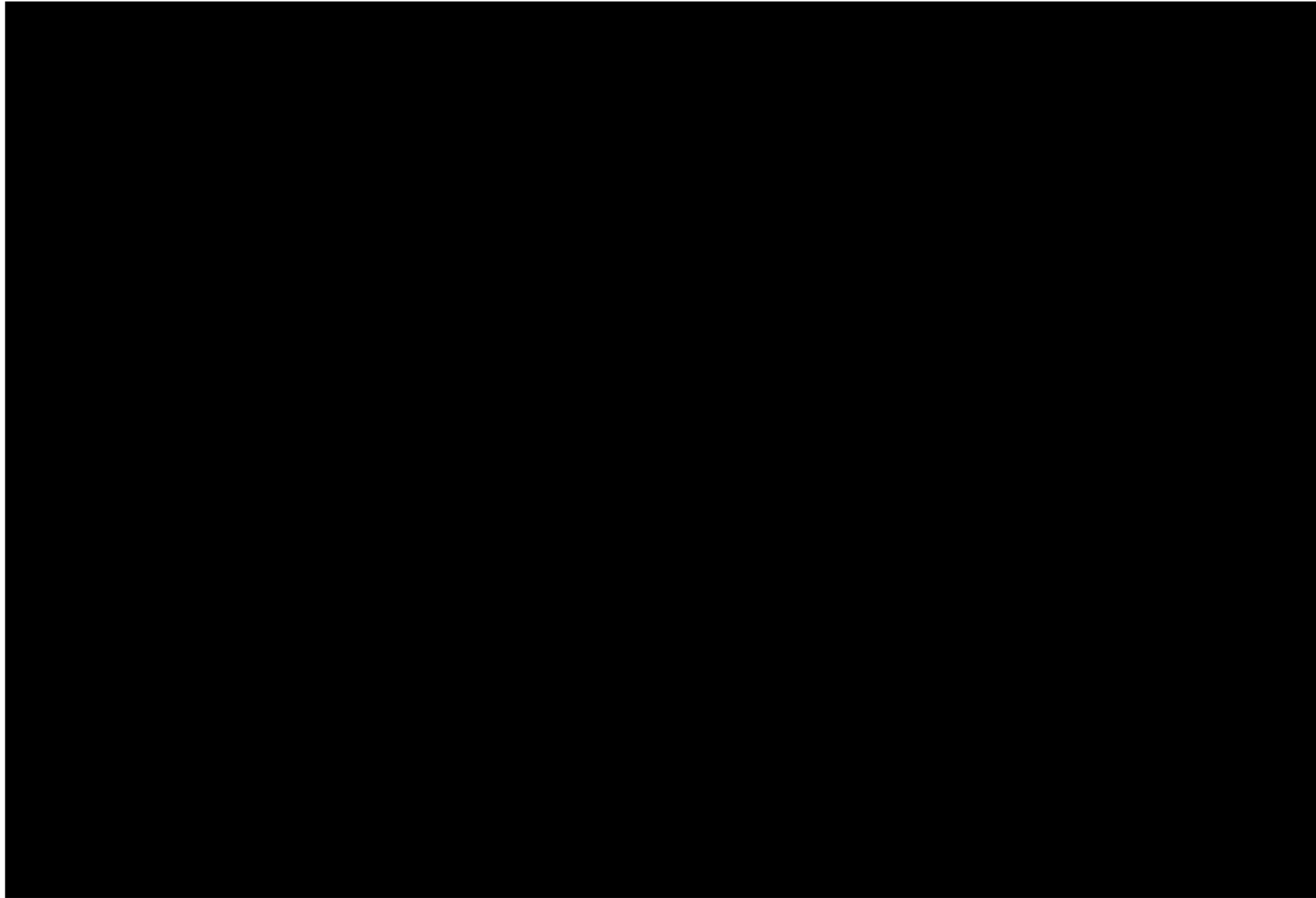
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243925-15206-EDG-ZZZ-XX-DR-A-0013-S2-D0100

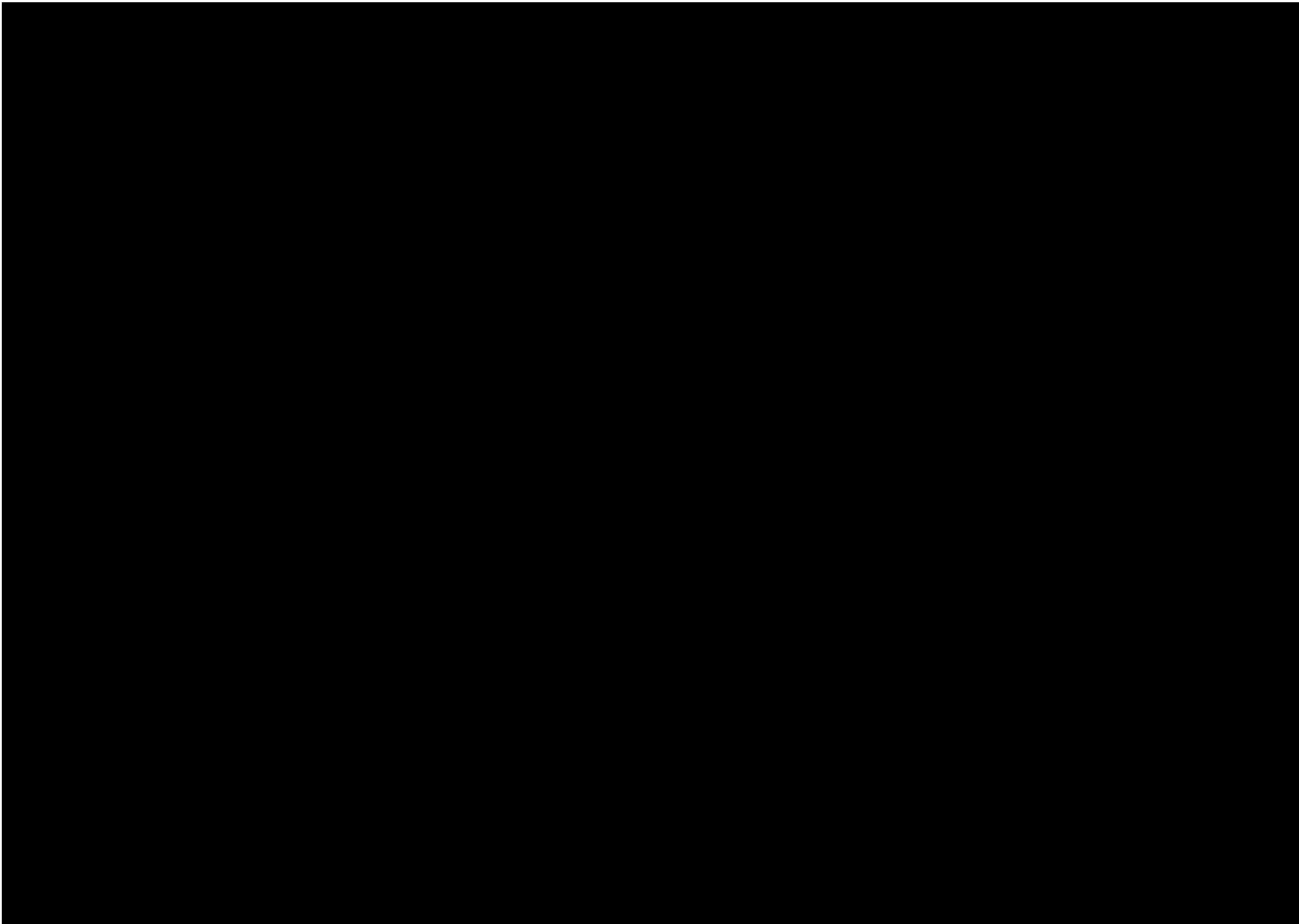
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2 of 2	1:500	@ A1	P03

Data Security Classification  
Official

Suitability  
S2

**Appendix A – Natural England Discretionary Advice Service (email)**





## **Appendix B – Desk Study Results**

