OXFORDSHIRE COUNTY COUNCIL

Crown Casework Team
Ministry of Housing, Communities & Local Government

By email to:

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The Leader's Office
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Councillor Neil Fawcett
Deputy Leader of the Council

17 September 2026

Dear Sir or Madam

Re: URGENT CROWN DEVELOPMENT APPLICATION MOD BICESTER SITE A: PROPOSED NON-DETAINED ASYLUM ACCOMMODATION
Ref. PCU/RARE/C3105/3378843 (26/01833/CROWN)

I am writing to you as Deputy Leader of Oxfordshire County Council to object to the proposed use of MOD Bicester Site A as large-scale asylum accommodation in our area.

Oxfordshire has a strong record of supporting all people in need, including those who have fled violence and persecution, which aligns with our status as a Council of Sanctuary. Our commitment is to ensure that anyone placed in the county by the Home Office is treated with basic dignity and humanity. Oxfordshire County Council does not consider that this proposal meets this commitment as it will be placing large numbers of people in an isolated site, in unsuitable accommodation, unable to work or volunteer and with limited access to basic services which are contrary to the integration, cohesion, safeguarding and public health policies and principles we aspire to. Such conditions do little to help people become part of, and contribute to, the communities in which they are living.

We will continue to speak up for the needs, safety and dignity of all our residents, both new and settled across Oxfordshire.

MOD Bicester site A is poorly connected to surrounding settlements and lacks access to buses, footways, cycleways and street lighting. There are unresolved questions about flood risk, land contamination, wildfire, hazardous materials and risks relating to fire protection between temporary accommodation units. These issues directly affect whether the site can safely accommodate such a large number of people.

Whilst the application recognises that people seeking asylum may have increased physical and mental health needs, the Council has not received sufficient assurance

about how these needs will be met. From a Public Health perspective, locally agreed arrangements for infectious disease prevention and outbreak management need to be put in place by the Home Office, alongside greater clarity on vaccination, prescribing, isolation capacity, contact tracing, room occupancy and the availability of spare rooms should there be an outbreak. Moreover, there is a question about whether shared modular accommodation can remain safe and suitable during increasingly extreme temperatures.

The proposal also gives insufficient detail on mental health support and privacy for people experiencing poor mental wellbeing or post-traumatic stress. A large institutional setting, with limited privacy and rapid turnover, could worsen distress for people who need stability and humane support.

Although the proposal is intended for adult males, errors in age assessments by the Home Office remain a significant risk. The Council requires clear, operational arrangements for identifying, safeguarding and the prompt relocation of any child who presents at the site. General references within the proposal to national guidance do not provide the site-specific safeguards needed for a facility of this scale.

The assumption that on site provision will make the development self-sufficient is not supported by adequate operational or financial detail. The Council has not received clear commitments about the range, capacity and quality of welfare and health services that will be provided on the site, nor how additional demands on adult social care, safeguarding, public health, fire and rescue, hospitals, transport and other local services would be assessed, funded and mitigated. The same concern applies to the capacity of local voluntary and community organisations to provide support at such a large scale.

The handling of the proposal by government has undermined confidence from the outset. Local authorities received less than 24 hours' notice and there was no prior engagement with local residents or partners. The application gives limited consideration to the impact on nearby communities, despite acknowledging possible anxiety, protest, demonstration or disorder associated with a non-detained site. The proximity to the Buckinghamshire border also gives the proposal a wider impact. Thames Valley Police, who have already had to engage with tensions before construction has begun, should be provided with additional financial support to keep people safe.

Moreover, the Council has not seen a sufficiently developed community engagement plan from government to prevent and respond to misinformation and community tensions. Decisions of this scale must be developed transparently and in genuine partnership with local communities which has not happened here.

Supporting people in need and standing alongside local communities are not mutually exclusive. A responsible asylum accommodation policy must do both. In the Council's view, this proposal does neither.

Yours sincerely,

Neil Fawcett

Cllr Neil Fawcett
Deputy Leader, Oxfordshire County Council
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17/09/2026
Ref: PCU/RARE/C3105/3378843

Dear Sir or Madam

Urgent Crown Development application: MOD Bicester (Site A): Bicester Garrison, Launton Road, Oxfordshire OX25 1AE

On 28th August 2026, the Leader of Buckinghamshire Council wrote to the Home Secretary to express his profound concern regarding the proposals to introduce an asylum accommodation centre at MOD Bicester, which is approximately 1.3km from the western boundary of Buckinghamshire. Therein, concerns were raised regarding the significant impact that this facility would have on communities, public services and local infrastructure within Buckinghamshire. The Council's correspondence also went on to question the suitability of the site, the apparent lack of recognition of the impacts that would be felt within Buckinghamshire, and the governance, engagement and decision-making processes that have been followed to the point of an application being made for 'Urgent Crown Development'.

Building on these critical issues that were raised by the Leader, this is a representation on behalf of Buckinghamshire Council to the Urgent Crown Development Application: MOD Bicester (Site A).

Procedural Concerns

Consideration of Urgency

The Town and Country Planning Act 1990 allows for two ways of determining applications for Crown Development at sections 293B and 293C 'urgent crown development' and crown development. The Council notes that the Ministry of Housing, Communities and Local Government determined that the proposal at MOD Bicester was deemed 'National importance and urgent' in July 2026.

Section 293B of the Town and Country Planning Act (TCPA) 1990 confirms that development can be considered urgent crown development where the authority considers –

(i) that the development to which the application relates is of national importance, and
(ii) that it is necessary that the development is carried out as a matter of urgency.

The Council does not dispute that the proposals are relevant to the criteria set out in respect of determining what constitutes 'national importance' within the Written Ministerial Statement

made on 13th February 2025. The Council does, however, have significant reservations around the proposals falling into a category that could be reasonably described as comprising development required as a 'matter of urgency'.

The Applicant's 'Statement on National Importance'[1], in respect of demonstrating urgency, describes that "*the Home Office is dealing with unprecedented numbers of asylum seekers requiring support, including accommodation to avoid destitution*" (p.3), however, earlier in the Statement, the Applicant accepts that "*the number of people claiming has fallen in the latest year, but remains high compared to the previous two decades*" (p.2). The Statement goes on to discuss how hotels had previously been utilised and this policy has been reversed for a number of compelling reasons. However, the decision to pursue MOD sites – in this case MOD Bicester – does not in itself come close to substantiating the assertion that the application is urgent for the purposes of Section 293B and 293C of the TCPA 1990.

The reasons provided for the appropriate route being Urgent Crown Development in the subsequent section of the Statement refer largely to the programme of the Applicant – for example, "*planning permission is required by late summer to allow works to begin to maintain the programme critical path. Current programme assumptions are to submit the Urgent Crown application by July, secure Urgent Crown approval by late August 2026 to enable required works to be completed.*"

It is, therefore, clear to the Council that the urgency for the development is derived from a project programme with identified milestones, rather than an immediate requirement for this form of development in this particular location. Whilst the Council does not dispute that the proposed development is of national significance, it does consider that the described urgency is not one that complies with the intent of Sections 293B and 293C of the TCPA 1990.

Furthermore, the Statement sets out that the proposal comprises 'Urgent Crown Development' to enable the Site to commence operation in 2026 – requiring a decision by the end of August 2026. The application was validated on 2nd September 2026 and, therefore, planning permission will not be issued with sufficient time to enable the site to be operational in 2026 as the Statement indicates that the applicant considers they will require four months from grant of consent to operation to resolve post-decision matters. It is, therefore, considered that the proposal has not evidenced the need for urgency for the additional reasoning of having failed to comply with its own programme – a programme that is being utilised to justify the circumvention of a non-urgent consenting route.

The Council also takes issue with the assertion that "*the management of the asylum accommodation estate is not a matter that can be addressed effectively at a purely local level.*"

The reasons provided include the Secretary of State's statutory obligations being nationally managed, changing patterns of need, and the pressures being borne across the system as a whole. These matters are not disputed; however, they are considered irrelevant when considering the consenting route for the application. These matters can rightly be arranged around the principles of the chosen location; however, they do not apply to the appropriateness of the consenting route for the selected site. The national operational flexibility, for example, does not apply to the consideration and mitigation of local impacts, which should always be understood within their

[1] https://assets.publishing.service.gov.uk/media/6a91601a9a177a1decf97b31/Bicester_-_Statement_of_National_Importance_redacted.pdf

local context, through local planning policies that this site would form one part of a wider system does not serve to justify the disapplication of such planning policy.

Buckinghamshire Council consider that the 'non-urgent' Crown development route would allow greater time for public scrutiny for the MOD Bicester proposal within a 12-week decision process.

Insufficient Information

The information required to be submitted with an application for urgent crown development is set out in Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025 Article 6. Part c (ii) requires:

"Any other plans, drawings or information necessary to describe the development which is the subject of the application".

The application contains only a site location plan, existing site plan, demolition plan and site parameters plan. An understanding of the space and services provided to residents within the asylum facility is necessary to assess whether the proposal for a managed operational model will meet the needs of residents and potential implications for services in the wider area.

Use of the 'non-urgent' Crown Development process would allow more information to be submitted and scrutinised through a Public Inquiry process.

A significant issue encountered by the Council in considering the application is the level of redacted information. This has made the application difficult to assess in full and, therefore, has meaningfully undermined the ability of the Council to provide full comment on critical aspects of the scheme, such as economic and transport impacts.

Deficiency of the Environmental Impact Assessment Screening Process

It is noted that the Applicant sought an Environmental Impact Assessment ('EIA') screening opinion in August 2026, which concluded that no EIA would be required to support the application scheme.

The Request for an EIA Screening Opinion dated 3rd July 2026[2] reports that the assumption of the assessment is that the maximum height of the modular units is no more than two-storeys. The submitted Parameters Site Plan (ref: BIC-DR-AR-100107 Rev P01) refers to an "*operational Development Zone up to 12m high measured from existing site levels*." It appears that the EIA screening opinion was undertaken based on different parameters to the application now submitted for determination. A revised EIA screening request should have been made prior to the submission of this application.

Further, the Council has concerns with the assessment of the cumulative impacts as only development within 2km of the site was included. It is unclear why the screening opinion considered that the development would have such a small zone of influence (ZoI), given that the proposal is within a rural location where development is separated and connected by fewer and more dispersed routes. The Rosefield Solar Farm ZoI, for example, was 10km. Whilst this is a nationally significant infrastructure project (NSIP), it is noted that the centres referred to within the application that would be accessed are largely 8km or more away from the application site, so 2km is considered to be evidently insufficient.

[2] https://assets.publishing.service.gov.uk/media/6a97de3ef5b35599aec19045/EIA_Screening_Direction_Request.pdf

There are a number of major infrastructure proposals in the northern part of Buckinghamshire which could generate significant cumulative impacts. The following schemes should be considered:

- High Speed 2 railway
- East-West Rail (PINS Case Ref: TR040012)
- Grendon Prison (LPA ref: 21/02851/AOP – PINS ref: APP/J0405/W/22/3307860)
- Rosefield Solar Farm (PINS Case Ref: EN010158)

Another key potential impact which has not been assessed is the cumulative impact on A41 road of construction and operational traffic from this scheme, alongside those already consented.

Beyond the cumulative impacts, restricting assessment to only 2km from the site is considered to be highly deficient, given that the services upon which the proposal would rely are further afield. The nearest hospital (John Radcliffe in Oxford), for example, is almost seven-times that distance away at over 13km.

The Council is acutely aware of ongoing capacity concerns that are being raised by Anglian Water and Thames Water, and the cumulative assessment fails to address these matters, which is particularly concerning given the significant intensification of use that is proposed within the application.

Furthermore, the Council consultation on its Regulation 19 Buckinghamshire Local Plan ran from 23rd July to 6th September 2026. Under the Town & Country Planning (Environmental Impact Assessment) Regulations this constitutes a 'plan' that should have been used to inform the screening opinion relating to cumulative effects assessments.

It is, therefore, the Council's opinion that the screening opinion has not been undertaken based on up-to-date and accurate information, with it clear that the screening opinion has not considered a development to the extent of the resultant scheme, and that it has not considered a suitably wide area when considering cumulative impacts.

Insufficient Pre-Application Consultation and Engagement

National policy and guidance on the criticality of early and meaningful consultation and engagement is unequivocal – as is the principle of seeking to front-load the application process as much as possible. Paragraph 001 of Planning Practice Guidance (PPG), for instance, opens with the statement that "*pre-application engagement by prospective applicants offers significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications and their likelihood of success.*[3]" The National Planning Policy Framework (NPPF), at Policy DM1: Preparing development proposals, states that "*proposals for major development should… be informed by early engagement with neighbours and the local community, as well as with the local planning authority, statutory consultees, infrastructure providers, registered providers of social housing and other relevant bodies where appropriate, to identify and seek to resolve key planning matters prior to the submission of a planning application. This pre-application engagement should be proportionate to the nature of the proposal and those likely to be affected by it*".

Buckinghamshire Council has not been involved at all in the development of the submitted proposals. Engagement with Cherwell District Council (CDC) as the local planning authority (LPA)

[3] Before submitting an application - GOV.UK

and Oxfordshire County Council (OCC) as the relevant strategic authority is unclear to Buckinghamshire Council, however, what is evident is that there has been no early and meaningful engagement with Buckinghamshire Council as an acutely relevant authority in respect of this proposal.

Impacts

Socio-Economic Impacts

Experience from similar schemes nationally has demonstrated that large-scale asylum accommodation can generate increased demand on police, health, local authority and voluntary sector services, particularly during the initial establishment phase. There is a significant and highly likely risk of organised protests and counter-protests, which can place significant pressure on policing resources, require enhanced community reassurance activity, and heighten tensions between different groups within communities.

There may be wider cross-boundary impacts as asylum seekers seek to access employment opportunities (if individuals are deemed eligible), support networks, public amenities, faith organisations and cultural services in neighbouring areas, including Aylesbury and Buckingham due to its diverse communities. This could generate additional demand on local places of worship, community organisations and support services. Ongoing partnership working between councils, police, faith groups and community organisations will therefore be essential to maintain community confidence, support cohesion and mitigate any adverse impacts. There needs to be a consideration on funding and resources to support these activities. More broadly, however, the Council maintains that the application is not supported by sufficient information to fully and properly consider the impacts on Buckinghamshire's assets and resources, especially in light of the emerging Buckinghamshire Local Plan.

The application relies heavily on the proposition that the site will operate as a largely self-contained facility, however, experience from comparable asylum accommodation developments suggests that residents routinely travel beyond site boundaries through organised transport arrangements and independent journeys to access a wider range of services, employment opportunities, community networks, faith groups and recreational facilities. Buckinghamshire Council is concerned that no meaningful assessment has been undertaken of the potential for regular movements into Buckinghamshire settlements such as Buckingham, Aylesbury and High Wycombe, or of the resulting pressures on transport networks, town centres, public services and community infrastructure. The potential use of existing cycle routes and connections to neighbouring villages has similarly not been considered.

Any planning consent should include legal obligations to provide sufficient, sustained financial support to the police and local authorities which monitor and manage community groups aligned to the who duration of the construction, operation and decommissioning of the site.

In terms of the Council's ability to fully consider the merits of the application, key details are omitted through redaction. For instance, projected job creation, both volume and type, are redacted. Estimating from the number of parking spaces has provided a range of between 130-250 jobs across 24/7 shift patterns, however, this approach is inherently flawed and undermines the validity of the fullness of the application. This number of jobs may lead to a number of low skilled jobs (admin, basic maintenance, housekeeping, kitchen, shop service, etc.) accessible for Buckinghamshire residents with access to a car. There may be a small number of service / management level jobs created. Some of this work may be seasonal if there are likely to be

significant fluctuations in service users in certain months of the year. There may be some displacement from jobs in local prisons in the immediate vicinity. There may also be some temporary jobs created for Buckinghamshire workers or firms in the construction industry. No data has been supplied on the number of jobs or the duration of works, as detail on the three construction phases has been redacted. Without full access to the analysis underpinning the content of the application, the Council cannot provide any more substantive comment than this.

Based on the information provided and in the absence of any additional information to reach a fuller view, the Council finds that the proposal would be contrary to Policies S3, HC3, P4 and P5 of the NPPF, and Policies S1 and S2 of the Vale of Aylesbury Local Plan 2013-2033 (VALP).

The Council trusts that the Applicant has undertaken consultation with the Integrated Care Board, NHS Trust Board and other health care partners.

Transport – Overview

Buckinghamshire Council has reviewed the submitted Transport Assessment (TA) and concludes that it is inadequate for the determination of the impacts of the proposed change of use for this development proposal. The extents of the redactions within the document render the conclusions impossible to verify by Buckinghamshire Council, in its role as local Highways Authority, and the extent of the assessments that are available for review are too limited in their scope. It is worth noting here that this lack of transparency means that we are also unable to scrutinise the assessment provided within the EIA screening submission to an appropriate degree, further undermining the robustness of that process.

The policy position that the TA is based on has changed since the document was written and it should now reflect the 2026 NPPF and the references should be updated. Specifically, Policy TR6 requires the consideration of construction impacts within the assessment: "*Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.*"

Transport – Construction Period

The TA has made no attempt to consider the construction impacts of the scheme, either through the demolition of the existing buildings on the site, which are noted to require specialist works and transportation of hazardous waste, or the construction of the new proposed accommodation units. This should be considered within a stand-alone situation and in a cumulative assessment with other significant infrastructure schemes in the locality, reliant specifically on the A41 corridor. Buckinghamshire Council, therefore, expects that assessment should include as a minimum the following schemes:

- HS2
- East West Rail
- Rosefield Solar Farm
- Development at Grendon Underwood/Springhill Prisons

The TA states that the accommodation will be modular units, however, it is not specified as to the types of buildings that the facilities will be housed in and, therefore, the construction impacts are not known.

Transport – Trip Generation and Traffic Impact

There is no assessment of the potential trip generation of the existing lawful use of the site against which a proper assessment of the highway impacts of development can be made, this should be included within a baseline assessment of the current highway conditions.

The trip generation of the site has been redacted to a degree to which the Highway Authority has no information available to it regarding the staff trip generation (including expected shift patterns), the residents trip generation, or the servicing and delivery trip generation or the expected peak development traffic periods. It is not possible to review these and draw any conclusions as a result.

The expected distribution of staff and proposed modal share has also not been provided or justified. This will underpin the transport modelling and therefore needs to be provided for review.

Regarding junction modelling, only the site accesses have been included with no reference made to the wider highway network, including roads within Buckinghamshire. Of particular interest is the impact on the A41 into Aylesbury as this is already a congested corridor.

Transport – Vehicle Access

Site access is provided on the B4011, between Palmer Avenue and Widnell Lane, within a 50mph speed limit, with a second access point further north. BC recognises that this road is within the Oxfordshire Highway Authority network. Assuming all access is to be taken via the northern access swept path analysis has been reviewed, this demonstrates that large vehicles are unable to enter and egress the site without using the full width of the B4011 and the site access. BC acknowledges that this is to take place outside its own highway network, however it demonstrates concern that the assessment has not been carried out in a rigorous manner with full consideration of the needs of the application.

Transport – Sustainable Access

The Council notes that the Applicant's transport case is heavily dependent upon the site's ability to operate as a largely self-contained facility. While on-site facilities will reduce some travel demand, the Council is not satisfied that the application demonstrates how the need for off-site trips will be minimised or managed over a ten-year period. There appears to be the intention to provide a shuttle bus service for residents to access external facilities which are not provided on site, however details of this shuttle bus including the proposed destinations, number of shuttle buses and frequency of services has not been provided.

The lack of a pedestrian network in the area means that access for staff or those resident on the site is only available by motor vehicle in the absence of safe and suitable access for walking and cycling. This has not been addressed in the TA.

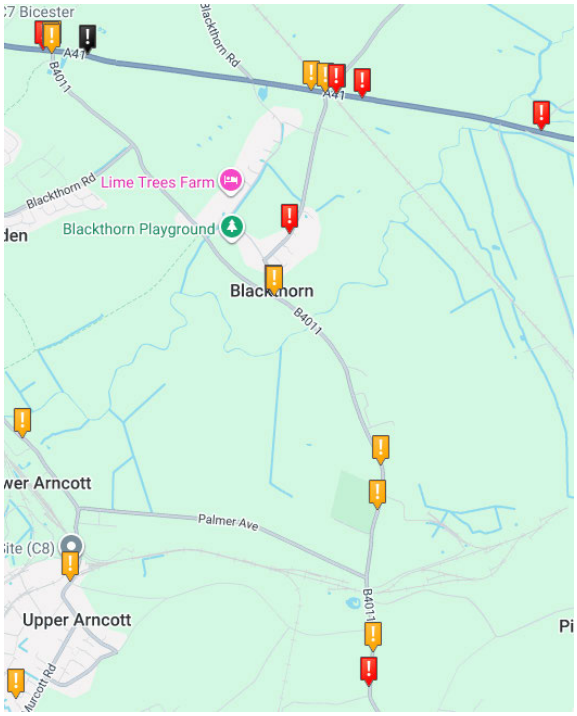
It is noted that the TA proposes to provide cycle parking for staff to choose cycling for their journey to work, however the failure to assess the cycling routes and the opportunity for safe cycling routes renders this to be a tokenistic element of the TA, lacking any evidence to support this as a viable mode of transport for this development.

The Highway Authority has reviewed the Travel Plan (TP) and concludes that it does not represent a meaningful set of proposals for the purposes of encouraging a change in mode choice towards sustainable travel. The TP is not supported by the TA in the form of provision of safe and suitable

walking and cycling routes to the site from any areas of likely origin for staff at the site. Therefore, the provision of information packs will not represent a likelihood of any modal shift taking place. The modal shift targets are considered to be of such low levels that they do not represent any form of ambition or measurable success.

Transport – Road Safety

The Highway Authority considers the road safety review to be carried out over an inadequate area, the review area covers the highway immediately adjacent to the site boundary, it does not, however, cover the principal locations of highway safety concern, notably the junction of the B4011 with the A41. An extract from CrashMap is supplied below, demonstrating the area with which this Highway Authority considers assessment necessary:



Transport – Cross-Boundary Travel Impacts

The site is located approximately 22km from Aylesbury and lies in close proximity to Buckinghamshire communities. The Council is concerned that the assessment appears to focus on the immediate Oxfordshire highway network and does not sufficiently assess the likelihood of movements into neighbouring authority areas, including Buckinghamshire.

While Buckinghamshire Council accepts that the site falls within Cherwell District and Oxfordshire County Council's administrative boundaries, local authority boundaries do not determine how individuals access transport networks, retail facilities, leisure opportunities, healthcare services or community facilities. It is reasonable to expect that some residents, visitors, staff and service providers associated with the development will travel into Buckinghamshire during the proposed ten-year operational period.

The Council, therefore, considers that further evidence should be provided regarding:

- likely travel patterns beyond the immediate vicinity of the site;
- expected destinations for residents' discretionary and non-essential trips;
- potential use of transport hubs within Buckinghamshire;
- interactions with Buckinghamshire communities and services; and
- likely staff commuting patterns and their effects on the wider transport network.

A full transport assessment should be provided to the Local Highway Authority through the Crown development procedure to enable full consideration of the transport impacts of the proposed on the surrounding highways network.

In terms of the current public transport offering, as far as it relates to Buckinghamshire, the Council records that the Council does not currently operate a route past the application site. All buses from Buckinghamshire towns and villages run through Launton and not on the A41 between Blackthorn and Bicester. The Council is currently retendering all of these routes, and this position is not planning to change as there is agreement with Oxfordshire County Council that Buckinghamshire services will serve Launton.

Cumulatively, the Council finds that the development would be contrary to Policies TR3, TR4 and TR6 of the NPPF, and Policies S1, T1, T4 and T5 of the VALP.

Ecology

There are known protected species using the Bicester MOD site alongside sites within Buckinghamshire. Cross county projects, such as the Bucks Owl & Raptor Group, monitor bird boxes in this area and wider bird monitoring is carried out on and around this site in both Oxfordshire and Buckinghamshire. Recent records of red listed bird species have been made adjacent to this site. Those records will need to be factored into the site assessments to determine if this proposal impacts those species. Several bat species are known to be present, the most significant of which is the Bechstein's bat. Roosts of this species along with foraging and commuting routes have been identified in adjacent woodland and farmland in both counties. A robust assessment of those species will be required and an acknowledgement and assessment of the cumulative impact of other local developments will need to be factored into these reports.

Community Engagement and Safeguarding

From a community cohesion perspective, there may be concerns amongst local residents regarding integration, public services and community safety, which, if not effectively managed through clear communication and engagement, could contribute to misinformation, social division and increased community tensions leading to an increase in hate related crime and incidents. It is critical to acknowledge that these concerns will spread beyond the area immediately adjacent to the site, especially with the introduction of shuttle buses to centres and wider communities.

Additional considerations should be given to safeguarding as clarity is required on how vulnerable residents within the accommodation will be identified, assessed and supported, including those with mental health needs, experiences of trauma, safeguarding risks, domestic abuse concerns or other vulnerabilities. There should be clearly defined processes for the reporting and escalation of safeguarding concerns across agency boundaries, together with arrangements for engagement with local safeguarding partnerships and statutory agencies where appropriate. Consideration should also be given to how domestic abuse incidents will be managed, including access to specialist support services, safeguarding pathways and victim-centred support for those affected.

Overall, the Council considers that the proposal would be contrary to Policies S3, HC3, P4 and P5 of the NPPF, and Policies S1 and S2 of the VALP.

Housing and Homelessness

Buckinghamshire Council is concerned that insufficient consideration has been given to the potential impacts of the proposal on local housing and homelessness services. Whilst accommodation provision during the asylum process is acknowledged, the application does not

adequately assess the implications of move-on arrangements for residents granted refugee status or otherwise exiting Home Office accommodation.

Experience from comparable schemes has demonstrated that local authorities may experience increased demand for housing advice, homelessness prevention services, temporary accommodation, rough sleeping interventions and tenancy sustainment support. The application provides no assessment of the likely scale of such impacts across the wider housing market area, including neighbouring authorities such as Buckinghamshire.

The Council considers that further information should be provided regarding move-on arrangements, partnership working with housing authorities, funding of support services, data-sharing protocols and measures to prevent homelessness and rough sleeping. Should the proposal proceed, formal governance arrangements should include representation from affected housing authorities to monitor impacts and coordinate responses.

The Council, therefore, considers that the application would be contrary to Policies H07 and H09 of the NPPF and Policies S1, S2 and H6c of the VALP.

Landscape and Visual Impacts

Buckinghamshire Council has reviewed the submitted Landscape and Visual Statement and notes its conclusion that the proposed development would be accommodated within an existing military landscape and that visibility would be limited by existing vegetation, topography and retained built form. The Council also notes that the proposed modular accommodation would be contained largely within the existing developed footprint of the site and that no nationally designated landscapes would be affected.

On the basis of the information submitted, Buckinghamshire Council does not identify landscape and visual effects as a principal concern in relation to the application. The Council accepts that significant landscape effects are unlikely and that visual effects are expected to be largely localised and experienced primarily from the B4011 and nearby public rights of way.

The Council recommends that existing mature vegetation is retained wherever possible and that appropriate landscaping, boundary treatment and external materials are secured through planning conditions to minimise visual effects over the lifetime of the development.

Notwithstanding this assessment, the Council has previously described how there are inconsistencies in the parameter plans and those considered during the EIA screening process. This remains a discrepancy of significant concern in terms of the process that has been followed in support of this planning application.

Noise

Buckinghamshire Council has reviewed the Noise Impact Assessment and notes its conclusion that the majority of the site falls within the Negligible to Low Noise Risk categories, with only limited areas adjacent to the B4011 requiring additional consideration through detailed acoustic design.

The Council nevertheless considers that any planning permission should secure appropriate acoustic mitigation through detailed design, including confirmation that internal and external noise targets can be achieved across the development. The Council also requests that operational noise management measures are incorporated into the Site Management Plan to ensure that potential impacts arising from the long-term occupation and operation of the site remain acceptable throughout the duration of the development.

Should any further information be provided by the Applicant, the Council reserves the right to reconsider its position.

Air Quality

Buckinghamshire Council has reviewed the Air Quality Screening Technical Note and notes the conclusions that construction phase dust impacts would be low risk and not significant with the implementation of the proposed mitigation measures, and that operational phase air quality impacts are not significant.

The Council does not consider that the proposal would give rise to significant adverse air quality effects on human health within Buckinghamshire.

The Council would nevertheless expect any air quality and dust mitigation measures identified within the assessment, together with any measures secured through the Travel Plan, to be implemented as part of the development.

Should any further information be provided by the Applicant, the Council reserves the right to reconsider its position.

Heritage

The Council recommends that any planning permission secures the archaeological investigation, recording and mitigation measures identified within the assessment because any heritage may have origins tied back to Buckinghamshire's history.

Should any further information be provided by the Applicant the Council reserves the right to reconsider its position.

Flood Risk and Drainage

Buckinghamshire Council has reviewed the submitted Flood Risk Assessment and accompanying Drainage Design Statement and does not identify any concerns in relation to the management of surface water runoff from the development that would impact Buckinghamshire. The Council has raised under the EIA section of this letter concerns around water/drainage.

Should any further information be provided by the Applicant, the Council reserves the right to reconsider its position.

Other Matters

Notwithstanding the use of legal agreement(s) to off-set the impacts on infrastructure, the Council would urge the need to ensure that the development comes along with appropriate Government funding for public bodies, including proximate local authorities.

The Council has responsibilities in the area of anti-social behaviour and, therefore, this should be considered as a part of this application in the event that issues spill over into Buckinghamshire communities given the proximity to Buckinghamshire and the vague reference to shuttle services being provided to nearby centres.

The Council considers that the proposals would result fall under the Doctrine of New Burdens and that the Government should fund the additional pressures.

Conclusion

The Council considers that the application site suffers from significant constraints in terms of sustainability, limited level of accessibility, and lack of service provision. It will be vital that all

services required for the efficient operation of the centre be provided within the facility itself to minimise cross-boundary impacts arising that would be harmful to Buckinghamshire's environment, communities and road network.

Cumulatively, the Council considers that this application supports an ill-conceived proposal that has not been sufficiently assessed from an EIA perspective, does not contain an adequate level of available detail for full technical consideration, and is being pursued erroneously through an inappropriate consenting route for which it should not be eligible.

Yours sincerely



Steve Bambrick
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Cherwell DISTRICT COUNCIL NORTH OXFORDSHIRE

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Please ask for:	***David Peckford***	Direct Dial:	*01295 227006*
Email:	[redacted]	Your Ref:	***PCU/RARE/C3105/3378843***

17th September 2026

Dear Sirs,

Urgent Crown Development Application: PCU/RARE/C3105/3378843
Cherwell District Council Reference: 26/01833/CROWN

MOD Bicester Garrison Site A, Piddington, Oxfordshire, OX25 1AE

Urgent Crown Development application for full planning permission for the temporary change of use of the former defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation. The Proposed Development comprises the retention and change of use of Building A6, the demolition of existing buildings and structures, the erection of new modular accommodation, and the provision of space for associated health and welfare facilities, site infrastructure, wastewater treatment plant, roads, access ways, security infrastructure, parking, staff accommodation and facilities, and open space and recreational areas, to accommodate up to 1,256 service users.

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

The application was considered by the Council's Planning Committee on 16 September 2026. The Committee agreed the recommendations contained in Appendix A to this letter and directed that the formal response should be prepared in the respects set out below. This letter gives effect to Appendix A, which is the direct foundation for the Council's response, and incorporates the further matters resolved by Committee. Appendix A should be read alongside this letter as the Council's detailed evidential and policy assessment. To the extent of any difference in emphasis, this letter records the Council's final consultation response following the Committee debate.

The Council is a mandatory consultee and not the determining authority. The decision rests with the Secretary of State under sections 293B and 293C of the Town and Country Planning Act 1990. The Council's response is therefore confined to the planning merits, the adequacy of the evidence and the measures required to make the consequences of the development properly understood and, where possible, controlled.

Formal position

Cherwell District Council acknowledges the national importance and asserted urgency of providing suitable asylum accommodation. Substantial weight is given to the Home Office's statutory functions, the objective of reducing reliance on hotels and the proposed reuse of previously developed Crown land. The Council's objection is not related to the identity, immigration status or protected characteristics of prospective occupants. It concerns whether the particular development proposed on this site has been sufficiently defined, assessed and shown to be acceptable in land-use terms.

The Council objects to determination of the application, and to any grant of planning permission, on the information presently available. The current submission does not fix the proposed layout, floor plans, elevations, sections, levels or the location and relationship of accommodation, infrastructure and mitigation. A general parameter allowing development up to 12 metres is inconsistent with the 6-metre scheme assessed in the EIA screening direction and landscape material. Important assumptions concerning surface water also conflict with the submitted drainage information. These are not insignificant matters: they prevent reliable assessment of the development's form, feasibility and effects.

The Council is not satisfied that safe and sustainable access, transport and walking arrangements, foul and surface-water infrastructure, public-service and healthcare capacity, energy, waste, fire safety, living conditions, ecology, trees, contamination, unexploded ordnance, lighting, landscape mitigation or the complete operating model have been satisfactorily demonstrated. These matters influence whether the scheme can be delivered at all and how it must be designed. They should not be transferred extensively to post-permission conditions.

Complete information and a renewed consultation period

The Committee considered it essential that no determination is made until the outstanding information identified in Appendix A has been supplied and properly scrutinised. The current representation period should therefore be extended immediately. If it is not practicable to extend it continuously, the application should be held in abeyance and a fresh consultation should begin only when a complete, consolidated and mature information package has been published.

The Home Office should submit one consolidated, comprehensive and internally coherent package rather than a series of inconsistent documents. It should distinguish openly publishable material from information that is genuinely security-sensitive. All non-sensitive material should be published together. Where sensitive information is material to the planning judgment, it should be reviewed by an independent specialist and accompanied by a meaningful non-technical public summary.

Following publication, the Council requests renewed consultation with Cherwell District Council, Oxfordshire County Council, all relevant statutory and specialist consultees, affected parish councils, including Piddington and Arncott, and the public. The Council considers that a period of not less than 21 days is proportionate, with additional time where a statutory or technical consultee reasonably requires it. Consultees must have the opportunity to consider the package as a whole and to comment on responses provided by infrastructure and service bodies. Any further material change should trigger additional consultation appropriate to its significance.

Urgency does not remove the need for a comprehensive and mature package of information, nor an informed and fair planning judgment. An updated programme timetable is required, identifying construction and first-occupation dates and explaining the practical consequences of allowing the above scrutiny now that the earlier July submission and late-August decision assumptions have passed. A general assertion that delay is undesirable is not sufficient to outweigh the need to establish that the scheme is safe, feasible and properly mitigated.

Essential information required before determination

Without limiting the full schedule in section 15.50 of Appendix A, the consolidated package must address the following matters.

1. Definition, design and phasing

- A proposed site plan or masterplan fixing each phase, building type and location (or at least a general parameters plan for location and massing) and compound use, general footprints, access points, internal roads, pedestrian and cycle routes, parking, servicing, open space, drainage, landscape buffers and all retained features.
- Floor plans, elevations, finished floor levels, plant plans, capacity, floorspace and maximum heights for each component.
- An amended parameter plan limited to the 6-metre envelope assessed, or new environmental, landscape and design evidence for every element proposed above that height.
- A design code covering massing, materials, colour, reflectivity, accessibility, privacy, daylight, ventilation, internal and external amenity space, refuse, plant and signage.
- A fixed phasing and occupation schedule showing the maximum population in each phase and the infrastructure and mitigation that must be operational before that phase is occupied.

2. Occupancy and site management

- A complete, enforceable Operational Management Plan covering staffing and supervision, arrivals and departures, visitors, service-user movements, welfare, recreation, worship, complaints, incidents, emergencies, monitoring and eventual decommissioning. It must bind any replacement operator.
- Clear confirmation of the expected and maximum length of individual stays, anticipated turnover and onward arrangements. The documents refer to a possible 90-day period but do not consistently establish it as an enforceable maximum. The transport, health, induction, safeguarding and service implications of a rolling population must be assessed in addition to the maximum concurrent occupancy of 1,256.
- A Community Impact, Cohesion and Liaison Plan based on the effects on Piddington, Upper Arncott, Hillside Park and other communities. It should include a 24-hour contact, complaints and escalation arrangements, regular liaison, publication of monitoring information and objective review and remedial triggers.
- A Safeguarding and Equality Management Plan covering confidential vulnerability assessment and referral, staff training, harassment prevention and reporting, specialist support, appropriate accommodation, emergency relocation and monitoring, including protection for LGBTQ+ people and others with protected characteristics or particular vulnerabilities.
- A transparent methodology for monitoring and supporting movement to and from the site, including any sign-in / sign-out arrangements.

3. Transport, access and walking routes

- An Oxfordshire County Council-agreed Transport Assessment and Travel Plan based on site-specific multi-modal evidence and realistic scenarios, not generic assumptions, subject to their independent representations.

- Assessment of construction traffic and all operational movements, service-user arrivals and departures, visitors, taxis, shuttles, deliveries, waste, fuel, wastewater tankers and emergency vehicles, together with cumulative effects arising from HMP Bullingdon and other committed development.
- A deliverable pedestrian and cycle strategy identifying the precise routes people are expected to use, highway and land ownership, lighting, surveillance, crossing and speed evidence, accessibility, maintenance responsibilities and every physical improvement required. Particular attention is required at the B4011 and on routes towards Piddington and Upper Arncott.
- Reconciliation of the proposed roles of each access, swept-path and visibility evidence, construction routing and booking controls, and confirmation that emergency access can be maintained at all times.
- A funded shuttle-bus specification stating destinations, frequency, hours, capacity, accessibility, contingency arrangements, review triggers and how performance will be monitored and corrected.

4. Healthcare, medical supervision and emergency services

- Written, costed and phased commitments from the relevant NHS commissioners, emergency services, and other affected bodies. Assurances must identify who will deliver each service, its capacity, funding, commencement date and responsibility for monitoring.
- A healthcare plan operational before first occupation, covering on-site medical supervision and clinical space, initial assessment and triage, primary care, medication and pharmacy arrangements, mental-health assessment and treatment, crisis response, safeguarding referrals, out-of-hours cover, communicable disease control, continuity of care and onward referral.
- An assessment of ambulance demand, emergency transfer, urgent care and the capacity of local services, with major-incident arrangements.
- A layout-specific fire and emergency strategy addressing appliance access, hydrants and water supply, separation, escape, evacuation, assembly areas, and multi-agency response.

5. Foul water, sewerage, surface water and utilities

- A phase-specific foul water strategy confirming treatment capacity, discharge destination, outfall and land rights, environmental permits, commissioning, maintenance and failure contingencies. Any proposed tankering must be quantified, time-limited and assessed as part of the transport case, including disposal locations and whether capacities are sufficient.
- A Lead Local Flood Authority agreed surface water strategy supported by surveys, levels, ground and infiltration testing and hydraulic modelling. It must reconcile the greenfield discharge rates used in screening, proposed impermeable areas, storage and treatment, exceedance routes, and maintenance.
- Written provider confirmation of water-supply, electricity, and fire hydrant capacity, and consideration of future demand and growth.

6. Ecology, landscape, land safety, waste and environmental effects

- Completed seasonal ecology surveys, Natural England’s material advice, an arboricultural impact assessment, clarification of biodiversity net gain requirements and an integrated ecology, landscape and lighting scheme with measurable protection, enhancement, management and monitoring.

- Landscape and visual evidence based on the actual layout and heights, including the effects on Piddington, Upper Arncott and public routes; and verified limits for external lighting and light spill.
- Detailed contamination, asbestos and unexploded ordnance investigation, including specific consideration of PFAS associated with former military use, followed by remediation, verification and unexpected contamination procedures.
- Construction, operational and decommissioning waste and materials plans.
- An Energy and Sustainability Statement covering the energy needs for the site, local capacity and potential cumulative impacts.
- Updated noise, air quality and odour assessments based on the proposed layout and all relevant plant and activities, including cumulative and night-time effects, with limits and monitoring.
- A detailed decommissioning and restoration plan for the end of the temporary period and beyond, including responsibility, timing, funding and aftercare.

Economic and strategic-growth assessment

The Committee requested an independent and proportionate assessment of the development's economic and strategic-growth effects. Bicester has an established role within the Oxford-Cambridge Growth Corridor and is expected to accommodate significant housing, employment and infrastructure growth. The application does not presently contain a socio-economic or strategic-growth assessment capable of establishing either material harm to investment and business confidence or a net local economic benefit.

The Home Office should therefore commission a socio-economic or strategic-growth assessment to identify positive as well as adverse effects and should address. The Home Office should request a proportionate assessment covering employment, procurement, local spending, the visitor economy, business confidence and the cumulative demand placed upon infrastructure needed to support planned growth. Targeted engagement with major employers and business organisations may also assist. The most immediate planning concern is whether the development would compete for already constrained electricity, water, wastewater, transport, healthcare and emergency-service capacity.

The absence of evidence is not proof that investment will be diverted or that economic harm will occur, therefore, generalised concerns about national perception should not determine the application. The present absence of assessment is nevertheless a material information gap, particularly where the same limited infrastructure capacity may be required both by this proposal and by planned growth.

Planning obligations, contributions and delivery mechanisms

The scale and duration of the proposal is likely to give rise to infrastructure and service impacts that cannot be made acceptable by planning conditions alone. The Council therefore requests discussion of a comprehensive infrastructure mitigation and draft heads of terms. This work should involve the Home Office, Cherwell District Council, Oxfordshire County Council, relevant NHS commissioners and providers, the ambulance, police and fire and rescue services, the drainage and environmental authorities and other bodies shown by the evidence to be affected.

The Crown status and temporary description of the proposal should not leave evidenced development impacts unfunded or dependent on unenforceable assurances.

The appropriate mechanism must be completed before any positive determination is issued as neither Cherwell District Council nor Oxford County Council can reliably specify final sums until the missing assessments and service-provider responses have been supplied.

Fallback controls if the Secretary of State is minded to approve

The following are fallback safeguards and do not remedy the present information deficiencies. If, notwithstanding the Council's objection, the Secretary of State is minded to grant permission, Cherwell District Council, Oxfordshire County Council and the relevant technical and service consultees should first be consulted on the complete wording of all conditions and obligations and on responsibility for their discharge, monitoring and enforcement.

No phase should be occupied above its approved cap, or at all, until the access and pedestrian works, transport service, commissioned water and drainage systems, power, healthcare and medical supervision, emergency-service arrangements, fire measures, waste systems, landscape and ecological mitigation and operational management required for that phase are in place and functioning. The permission should fix the layout (or at least define clear parameters), phases, floorspace, building-specific heights and occupancy; limit accommodation to the assessed 6-metre envelope unless a specifically identified higher element has been fully assessed; expire after ten years without automatic extension; secure phased decommissioning and restoration; and restrict, so far as lawfully possible, later development that could materially alter the assessed envelope.

Conditions and obligations should also secure the full management, liaison, equality, safeguarding, transport, drainage, ecology, landscape, lighting, contamination, PFAS, UXO, asbestos, fire, noise, air-quality, odour, energy, waste, archaeology, monitoring and reporting controls described in sections 15.52 and 17 of Appendix A. Approval of fundamental feasibility matters should not be left to a condition that offers no realistic alternative if a solution cannot subsequently be delivered. Mechanisms for suitable contributions will also need to be agreed.

Conclusion

Following a meeting of the Planning Committee on 16 September 2026, Cherwell District Council respectfully requests that the application is not determined on its present basis. The current information does not define a coherent development or demonstrate that its principal effects and infrastructure requirements can be acceptably addressed. The Council's formal position is therefore an objection to determination and to any grant of planning permission at this stage.

The appropriate course is to require the consolidated information described in Appendix A and this letter; publish all non-sensitive material as a single controlled package; obtain and publish the relevant technical and service-provider responses; extend or renew consultation for not less than 21 days; and then reassess the proposal and its planning balance. This would not prejudge the eventual outcome. It would ensure that the national considerations advanced by the Home Office are weighed against a properly defined scheme, reliable evidence and enforceable mitigation.

The Council remains willing to engage promptly with the Crown Casework Team, the Home Office and relevant consultees on the scope of the further information, consultation arrangements, conditions and potential obligations. That engagement should not, however, be treated as withdrawing the objection or accepting that the present submission is adequate for determination.

Yours faithfully,



David Peckford
Assistant Director – Planning
Place and Regeneration
On behalf of Cherwell District Council

Enclosure: Appendix A – MOD Bicester Site A Committee Report, 16 September 2026

APPENDIX A

CHERWELL DISTRICT COUNCIL COMMITTEE REPORT DATED 16 SEPTEMBER 2026 FOR MOD BICESTER GARRISON SITE A, PIDDINGTON, OXFORDSHIRE, OX25 1AE

Urgent Crown Development Application: PCU/RARE/C3105/3378843

Cherwell District Council Reference: 26/01833/CROWN

APPENDIX A

26/01833/CROWN

Case Officer:	Rob Duckworth
Applicant:	**Home Office (application to the Secretary of State/MHCLG)**
Proposal:	Urgent Crown Development application for Full planning permission for a temporary ten-year change of use and phased non-detained asylum accommodation for up to 1,256 service users, with demolition, modular buildings, health and welfare facilities, wastewater treatment, access, security, parking, staff facilities, open space and recreation at MOD Bicester Garrison Site A, Piddington
Ward:	Launton and Otmoor
Councillors:	Cllrs Dr Timothy Faltermeyer, Julian Nedelcu and Alisa Russell
Reason for Referral:	Planning Committee is asked to agree Cherwell District Council's formal consultation response to the Secretary of State / MHCLG on an Urgent Crown Development application of major scale and significant public interest. CDC is not the determining authority.
Expiry Date:	*17th September 2026* **Committee Date:** 16th September 2026 16:00

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1. PURPOSE AND STATUS OF THIS REPORT

1.1. This report enables Planning Committee to consider the land-use and planning effects of the proposal and to inform Cherwell District Council's formal response to the Secretary of State.

1.2. The Committee is not determining the application. The Secretary of State is the determining authority under sections 293B and 293C of the Town and Country Planning Act 1990. Cherwell is the relevant local planning authority and mandatory consultee. The report therefore recommends the position the Council should communicate to the SoS; it does not purport to grant or refuse permission.

1.3. The covering report published with the agenda on 8 September explained that the submission and consultation responses were still being reviewed. This document is the detailed officer assessment, and has been made with all the material made available to the Council up to 10 September 2026. Any further substantive technical advice received before the Committee meeting will be issued as written update or verbally, and anything submitted prior to the Government's deadline of 17 September will be reported by addendum and reflected under the delegated authority recommended below

2. RECOMMENDATION

2.1. That Planning Committee:

- **endorses a formal objection** to determination and to any grant of planning permission on the present limited evidence, because the proposal is not sufficiently defined or assessed with sufficient depth and several matters fundamental to the acceptability of the proposals remain unresolved;
- **requests that no determination** is made until the responses of relevant statutory and specialist consultees including the Environment Agency, Natural England, Oxfordshire County Council, NHS bodies and relevant utility providers, have been received and fully considered
- **requests that the Secretary of State** requires the information in section 15.50 of Appendix 1 (this document), publishes all non-sensitive additional material, makes appropriate arrangements for genuinely sensitive material to be independently examined, and provides a further reasonable opportunity for the Council, consultees and the public to comment before determination;
- **confirms that urgency and national importance** are acknowledged as considerations of substantial weight, but do not displace the need for an informed planning judgment or justify transferring questions of basic feasibility to conditions;
- **requests that if decision is made by MHCLG that it should be refused,** because the Council cannot be satisfied based on the information submitted thus far, that the development would be safe, sustainable, properly serviced or acceptable in design, landscape, community, transport, drainage, ecology and amenity terms; and
- **authorises the Assistant Director - Planning, in consultation with the Chair or Vice-Chair of Planning Committee**, to finalise and submit the Council's response, including necessary minor or technical amendments, late consultee advice and the protective controls, provided the substance of the Committee's resolution is maintained.

3. EXECUTIVE SUMMARY OF OFFICER ASSESSMENT

3.1. The national need for additional asylum accommodation, the statutory responsibilities of the Home Office, reduction of reliance on hotels and reuse of previously developed defence land are material benefits. The Secretary of State has already accepted that the proposal should enter the urgent Crown procedure. Those matters attract substantial positive weight.

3.2. The current submission does not answer whether this particular development, on this site and in this form, is acceptable. The application is expressly described as a full application, yet the public drawing set comprises only a location plan, existing plan, demolition plan and a broad parameters plan. There is no proposed site layout, floor plan, elevations, sections, levels plan, roof or plant plan, landscape plan, lighting plan or detailed access and servicing layout. The single parameters plan would allow operational development up to 12 metres high across a broad zone

without identifying where the accommodation, healthcare, recreation, waste, energy, security, roads or wastewater infrastructure would be placed.

3.3. Omissions are not a matter of presentation alone. It prevents reliable assessment of built form, landscape and visual effects, living conditions, daylight, fire separation, emergency access, drainage, flood safety, trees, habitats, archaeology, contamination, security, noise, odour, pedestrian routes, parking and servicing.

3.4. Cherwell's ordinary validation checklist for full non-residential development over one hectare requires proposed site/block plans, elevations and floor plans. While the urgent Crown procedure has its own requirements and the Secretary of State has accepted the application, this is a useful local benchmark: the application would not be validated by Cherwell as a full application in its present form.

3.5. More importantly, the urgent Crown guidance itself requires all plans, drawings and information necessary to describe the development and sufficient information for an informed planning judgment. Administrative validation does not establish planning sufficiency. The Crown Casework Team is expressly able to request further information.

3.6. There are material inconsistencies in the scheme said to have been assessed. The parameters plan permits buildings up to 12 metres tall. However, the Secretary of State's EIA Screening Direction expressly assesses modular accommodation at no more than two storeys / 6 metres high, and the applicant's landscape case likewise relies on units no greater than 6 metres. The Screening Direction also relies on greenfield runoff rates and no additional hardstanding, whereas the submitted drainage material records that Phase 1 cannot achieve greenfield restriction in the lowest part of the site and refers to approximately 440m^2 of new impermeable surfacing. These are significant details: the permission, the environmental screening and the technical assessments must relate to the same maximum development.

3.7. The Council's Landscape Officer raises no objection in principle, but only on the assumptions that the assessed scale and development envelope are observed and the vegetation providing containment is retained and reinforced. The Urban Design Officer is satisfied that contextual and functional requirements have been considered 'at this outline stage'. Those responses are important, but their responses stress the central issue: they do not establish that an undefined 12-metre high full application is acceptable.

3.8. The potential effect on the nearby settlements of Piddington and Upper Arncott is a central, and very controversial planning issue. The facility would accommodate a population substantially larger than either. Future residents would be free to leave the accommodation to use services and facilities elsewhere, with little information provided as to how they could travel sustainably between the facility and services elsewhere. Whether all 1,256 people leave together is not the main issue; it is the repeated, cumulative pattern of individuals and small groups travelling at different times, including evenings and periods when transport is unavailable, and the effect on unsafe rural roads, local public space, services, community cohesion and residents' wellbeing.

3.9. The short representation period is lawful in the sense that the urgent procedure permits an expedited timetable, but ten calendar days is not a reasonable practical period for a proposal of this scale, complexity and public interest where the public pack is extensive, yet lacking, key consultees have not reported, and the proposal itself remains unsettled. The Home Office urgency statement assumed submission in July and approval by late August 2026; those milestones had already passed when the application was validated on 2 September. The applicant should provide an up-to-date timetable and clearly explain how allowing sufficient time to properly assess the application would affect the delivery of the scheme.

3.10. Foul and surface-water solutions, safe pedestrian access, health and emergency-service capacity, power, waste, fire safety, contamination, ecology and the full operational model remain materially unresolved. Conditions may secure detailed implementation after the principle and feasibility of a solution are established. They should not substitute for evidence that an acceptable solution exists.

4. CORPORATE IMPLICATIONS

- **Legal and procedural:** the Secretary of State is the decision-maker. The Council's response should remain directed to material planning considerations, explain the evidential basis for each conclusion and avoid presenting administrative validation as a merits judgment.
- **Equalities and human rights:** the assessment concerns land use, infrastructure, safety, health and amenity. It does not rely on the nationality, religion, sex or immigration status of prospective occupiers, generalised fear or the number of objections. The needs and safety of service users, nearby residents and people with protected characteristics must all be considered.
- **Climate and environment:** the Climate Action Plan, Healthy Bicester and Oxfordshire Marmot Place commitments are relevant corporate context but are not substitutes for development-plan policy. Their land-use objectives are addressed through the adopted plan and current national policy.
- **Financial and service implications:** no Council expenditure is authorised by this report. Any planning obligation must meet the statutory tests. Separate inter-governmental funding may properly address wider service burdens that cannot lawfully be secured through planning.
- **Risk:** a decision on an undefined and internally inconsistent scheme creates a material risk of effects being discovered only after permission or during phased occupation. The requested information, renewed consultation and phase-specific controls are intended to manage that risk.

DETAILED PLANNING ASSESSMENT AND DRAFT CONSULTATION RESPONSE

MAIN REPORT

5. APPLICATION, SITE AND LOCALITY

5.1. The application relates to MOD Bicester Site A, part of the former Defence Storage and Distribution Centre / Bicester Garrison complex situated in the countryside to the south-east of Bicester, between Piddington and Upper Arncott. The site lies generally to the east of the B4011 in the vicinity of Widnell Lane and Palmer Avenue.

5.2. Site A is a substantial former military storage and logistics site with an established network of internal roads, hardstanding, service infrastructure and military buildings/structures. The wider site has a long-standing defence use dating from the Second World War. The Home Office material supplied to the Council states that Site A is no longer in active use by the Ministry of Defence.

5.3. The submitted location plan defines an irregular red-line area with a long access spur to the southern B4011 entrance. The application form and principal planning documents identify the site as approximately 10.22 hectares, although other documents refer to 9.36 hectares and 5 hectares, perhaps referring to the areas being principally used for accommodation.

5.4. The land is substantially previously developed, with extensive hardstanding, internal roads, Nissen huts, warehouses, perimeter fencing and utility infrastructure. Much of the accommodation area is vacant or underused, although the transport material refers to continuing activity in part of the wider depot. The lawful and operational baseline should be confirmed.

5.5. Two gated accesses exist from the B4011. The northern access has not been used for a considerable period and is unlit; it is proposed as the principal operational access. The existing southern access would be used for construction and emergencies and crosses the line of the disused military railway. The B4011 is subject to a 50mph limit with a history of road traffic incidents. There is no continuous safe pedestrian route from the northern access and the submitted Transport Assessment records limited walking, cycling and public-transport accessibility.

5.6. The parameter plan places a broad operational development zone over most of the northern and central site. The plan legend permits development up to 12 metres above existing site levels. This conflicts with written material describing two-storey modular buildings of up to about 6 metres. The 12-metre envelope must be assessed unless a revised plan narrows it.

5.7. The surrounding area is predominantly rural in character, although the extensive former military estate, roads, hardstanding, storage buildings, utility infrastructure and other operational/previously operational development give the immediate locality a distinct developed military character. Piddington lies to the south-east and Upper Arncott lies to the south/south-west, both within 2km walking distance, with other settlements including Ambrosden and Blackthorn in the wider area.

6. CONSTRAINTS

6.1. The following matters are known from the site history or are likely to require specific consideration:

- Previously developed former military land with extensive hardstanding, buildings and infrastructure.
- Overhead high-voltage electricity lines crossing the site; the submitted parameter plan does not clearly define an exclusion/easement corridor.
- Areas of mapped surface-water flood risk and an existing drainage network reported to be in poor condition or obstructed; small peripheral areas of fluvial Flood Zones 2 and 3.
- Potential hydrological pathway to Arncott Bridge Meadows SSSI, on which Natural England has requested further information and reconsultation.
- Trees, hedgerows, scrub and potential protected-species habitat; the application correspondence identifies further surveys for bats, badger, dormouse, breeding birds, great crested newt/amphibians, reptiles, otter and water vole.
- Military land-use legacy including potential contamination, asbestos-containing structures, ground risk and unexploded ordnance (UXO).
- Potential Roman and medieval archaeological remains. No designated heritage asset lies within the site; listed buildings at Piddington are separated from it and reported to lack intervisibility.
- Rural location with limited access to shops, healthcare, public transport and other day-to-day services by walking, wheeling or cycling.
- Existing defence, prison, electricity, railway and other infrastructure in the vicinity, requiring safe integration and emergency planning. Trees, hedgerows and existing perimeter vegetation have historically provided significant screening of the site and will require current arboricultural and landscape assessment.
- The site is close to the Bicester Military Railway and an existing level crossing/access arrangement. Highway, pedestrian, cycle, public transport and rail interface matters require detailed assessment.

7. DESCRIPTION OF PROPOSED DEVELOPMENT

7.1. The Home Office seeks full planning permission under sections 293B–293C of the Town and Country Planning Act 1990 for a phased, temporary, non-detained asylum accommodation centre for up to 1,256 single adult male service users aged 18–65. The Secretary of State accepted on 2 September 2026 that the proposal is nationally important and required urgently. MHCLG is the decision-maker, supported by the Planning Inspectorate; the Council is a statutory consultee.

7.2. The proposed use is for ten years. The development would retain and change the use of Building A6, demolish existing buildings and structures, install two-storey modular accommodation and ancillary buildings, and provide internal roads, parking, security, utilities, open space and recreation. The description and use-class entry should be clarified because the application form refers to Class C2A while the proposal is expressly non-detained and may be a sui generis use.

7.3. The written statement describes three phases:

- Phase 1 for 408 service users on the north-western hardstanding;
- Phase 2 for 216; and
- Phase 3 for 632.

It also refers to approximately 130 staff, four substations, generator compounds, water storage, 147 car spaces and only eight cycle spaces. These details are not fixed by a proposed layout submitted for approval.

7.4. The submitted schedules refer to approximately 15,950m^2 of demolition; 1,400m^2 retained/change-of-use floorspace; 14,471m^2 of new modular buildings; a 3,105m^2 wastewater treatment area; and a 359m^2 pumping-station area. Those figures do not reconcile with all totals stated elsewhere in the application. A corrected, single development schedule is required.

7.5. The applicant describes single- and two-storey modules and relies on a 'Rochdale Envelope[1]' to defer detailed design to conditions. The only plan said to establish the development envelope allows operational development up to 12 metres above existing levels across a broad zone. No proposed layout or building drawings are supplied. The application therefore combines the label and legal outcome of a full application with the information content of an early parameter or outline proposal.

7.6. The proposal includes kitchen/dining, laundry, welfare, reception/interview, education, multi-faith, indoor/outdoor recreation, gym and staff facilities, and space for an on-site medical centre. The evidence does not yet secure the staffing, opening hours, service specification, commissioning or funding of all facilities.

7.7. The Operational Management Plan is expressly an outline. A full plan is to follow appointment of the service provider. Important passages concerning admissions, movement, visitors, health and safety, self-harm, security and incident management are blank or withheld in the public version. Security-sensitive information may properly be protected, but non-sensitive operational commitments material to transport, healthcare, amenity and community effects still need to be defined and enforceable.

7.8. The Transport Assessment identifies 139 standard and eight accessible staff/visitor car-parking spaces, eight cycle spaces and an equivalent number of powered two-wheeler spaces. No service-user car parking is proposed. Coach/minibus and

[1] The Rochdale Envelope is a legal principle used in UK environmental impact assessments (EIAs) that allows developers to apply for outline planning permission or infrastructure consent with flexible project parameters, provided the maximum potential environmental impacts are fully assessed.

servicing areas are indicated. Staff numbers, detailed trip generation and some operational transport assumptions are redacted or blank in the material available to the Council and should be supplied confidentially if genuinely security-sensitive.

8. RELEVANT PLANNING HISTORY

8.1. The site has a particularly relevant planning history involving previous Home Office proposals for asylum/immigration accommodation.

8.2. **02/01045/GD** - In 2002 the Home Office submitted a deemed-consent proposal under the then Crown development procedures for an Accommodation Centre for up to 750 Asylum Seekers on the DSDC (MOD) Site A near Piddington. Cherwell District Council objected. A non-statutory Public Inquiry was subsequently held (Secretary of State reference APP/C3105/V/02/1097458). The Inspector recommended refusal, principally because of conflict with the development plan and the unsustainable rural location, but the Secretary of State disagreed and granted conditional outline planning permission on 18 August 2003, attaching substantial weight to national need, the previously developed nature of the land and the benefits of the proposal. The Council's legal challenge was unsuccessful.

8.3. Detailed proposals under **04/02503/GD** were subsequently supplied for siting, design, layout, external appearance, landscaping and lighting. In March 2005 Cherwell objected to the accommodation-block design and landscape effect, night-time lighting intrusion and driver distraction on the B4011. The Secretary of State did not determine those details and the project was seemingly abandoned. This history demonstrates that design and lighting cannot be assumed acceptable merely because the principle of an accommodation use was previously supported nationally.

8.4. **08/02511/F** - Full planning application by the Home Office UK Border Agency for demolition and the erection of an 800-person Immigration Removal Centre on part of Site A, including accommodation, central facilities, gatehouse, visitor centre, energy centre, parking, access, security fencing, hardstanding and landscaping. The 2008 committee report recorded a 14 hectare application site and recommended approval subject to departure procedures, legal agreement/transport mitigation, resolution of Environment Agency and other technical matters, and conditions.

8.5. The 2008 proposal is materially different from the current scheme because it was a secure immigration removal centre with detainees, whereas the present proposal is understood to be open asylum accommodation with residents able to leave the site. Nevertheless, the previous decisions remain material to the extent that they address the principle of substantial Home Office development on Site A, the previously developed character of the land, landscape containment, transport sustainability, infrastructure and ecological constraints.

Comparisons with HMP Bullingdon

8.6. HMP Bullingdon, about 300 metres to the south-west, is a relevant physical and cumulative reference. Full planning permission 21/04216/F was issued on 22

September 2022 for a new 240/247-bed, four-storey accommodation houseblock and ancillary buildings, extensions, parking and landscaping. The officer report records about 9,704m^2 of new floorspace and acknowledges that parts of the four-storey roof would be visible, but concluded that the established prison, tall perimeter wall, existing three- and four-storey buildings, internal siting and mature planting limited the effect.

8.7. That permission shows that taller development can, in appropriate circumstances, be accommodated in this broader developed landscape. It does not establish that 12-metre development anywhere within Site A is acceptable. The prison proposal had a fixed layout, building-specific floor plans and elevations, a long approved-drawing schedule, ordinary publicity and consultation, committee scrutiny, a S106 contribution of £125,000 towards public transport, and conditions tied to identified plans. It was inside an existing secure prison whose occupants' external movement is not comparable.

8.8. The HMP report also recorded limited pedestrian access, surface-water accumulation, water-network constraints and the need for sustainable transport and infrastructure measures. Current variations and discharge applications confirm ongoing implementation. The cumulative construction and operational effects of the prison expansion must be included in the present transport, drainage, utilities, landscape and emergency-service assessments rather than dismissed solely because the prison population is detained.

9. PRE-APPLICATION DISCUSSIONS

9.1. No formal pre-application planning submission had been made to Cherwell District Council. The Council became aware of the Government's intention to explore use of Site A for asylum accommodation in June 2026 and has since been collating information in anticipation of the formal Crown consultation.

9.2. A meeting at the beginning of August with the Crown Casework Team and members of CDC was only to confirm the processes involved and broad approach of administration; no details, timescales or principle planning matters were discussed.

10. PROCEDURAL POSITION, URGENCY AND CONSULTATION

10.1. The Secretary of State validated the application on 2 September 2026 and invited representations between 7 and 17 September 2026. The Secretary of State had previously concluded that the development was nationally important and genuinely urgent and, on 26 August 2026, had directed that it was not EIA development.

10.2. The Urgent Crown Development procedure changes the decision-maker and deliberately accelerates consultation. It does not remove the statutory and policy need to consider all relevant planning matters. Government guidance requires any plans, drawings or information necessary to describe the development and sufficient information to make an informed planning judgment. It also provides for the Crown

Casework Team to request further information and for an independent adviser with security clearance where material information cannot be disclosed publicly.

10.3. In principle, the Home Office's urgency case is entitled to substantial weight. It identifies continued demand for asylum accommodation, the objective of reducing hotel use, operational resilience and the consequences of delaying this additional facility. However, the stated programme assumed submission in July, permission by late August and works thereafter to allow bedspaces in 2026. Validation did not occur until 2 September. The report does not provide a revised timeline, phase-opening dates or evidence of what additional delay would result from a short but adequate further consultation after the missing information is supplied.

10.4. There is therefore a need to understand why the current ten-day public period is necessary and proportionate. The issue is not that every urgent application must reproduce ordinary timescales. It is that this period includes only eight working days, covers a large and technically complex pack, despite being incomplete, and expires before many specialist responses can reasonably be obtained, reviewed and debated. Consultation is less meaningful where the proposal itself is not capable of being understood spatially and comprehensively.

10.5. Current NPPF policy DM1 expects major proposals to be informed by proportionate early engagement with the community, local planning authority, consultees and infrastructure providers. The Council and the Leader's correspondence record that no meaningful local engagement took place before the public announcement. The applicant refers to an operational working group, stakeholder engagement and future forums, but does not explain what planning changes resulted from pre-application engagement. The absence of early resolution has transferred an unreasonable burden to the compressed statutory period.

10.6. It is considered that the Secretary of State should not determine the application until the Council and others have had a reasonable opportunity to comment on a complete and reconciled proposal. Any materially amended plan, drainage solution, access design, operational model or environmental assessment should be published and consulted upon for a new period proportionate to its significance.

11. INFORMATION ADEQUACY AND VALIDATION

11.1. Validation is an administrative endeavour; it is not an assessment or conclusion that the proposal complies with policy, that its effects are acceptable, or even that every detail required for determination is present. The Secretary of State's acceptance of the application must be respected, but it does not prevent the Council identifying deficiencies or requesting further information under the published guidance.

11.2. Notwithstanding the redactions, if this application had been submitted to Cherwell District Council as a full planning application for non-residential development on a site over one hectare, it would not meet the Council's current validation checklist and would have been returned as invalid. The national-list section of that checklist requires existing and proposed site/block plans, existing and proposed elevations and existing and proposed floor plans. The local list also identifies, subject to

relevance, landscape, lighting, parking/servicing, surface-water drainage, transport, tree, ecology, contamination and flood information. Here, essential proposed drawings are absent and several technical documents state that key surveys, modelling and design will be done later.

11.3. The tests of the Urgent Crown Development procedure are expressed differently but has the same intention: the application must include what is necessary to describe the development and allow an informed planning judgment. A broad land-use label, maximum population and 12-metre zone do not sufficiently define a development of 17,935 square metres with sleeping accommodation, hazardous former land uses, new wastewater infrastructure, extensive servicing and potentially sensitive security measures.

12. RESPONSE TO PUBLICITY

12.1. This is not a planning application for determination by Cherwell District Council. Under the Urgent Crown Development procedure, the application is made directly to and determined by the Secretary of State. MHCLG is responsible for the statutory consultation/representation process and may ask the Council to assist with local publicity, including the display of site notices.

12.2. This report and the committee's consideration of it are therefore intended to inform and authorise the Council's formal representation to MHCLG. Public representations on the Crown application should be made through the process specified by MHCLG.

12.3. Internal departments have been consulted and any responses received have been summarised in the table below. Matters concerning the merits of national asylum / immigration policy as such are not, by themselves, land-use planning considerations; however, the land-use consequences of the proposed accommodation, including safety, amenity, transport, infrastructure and community impacts, are material where supported by planning evidence.

Topic	Published position	Why is this important?
Proposed layout	None published; only a broad development zone.	Cannot locate phases, buildings, roads, open space, access, parking, plant, drainage, trees or buffers.
Plans / elevations / sections	No proposed floor plans, elevations, roof plans, sections or finished levels.	Cannot assess mass, appearance, living conditions, fire separation, accessibility, levels or visibility.
Height envelope	Parameter plan: up to 12m; EIA and landscape case: no more than 6m.	Permission and assessment do not address the same worst case.

Topic	Published position	Why is this important?
Floorspace	17,350m^2 appears on the form; 17,935m^2 in the statement.	Scope of permission, impacts and fee basis need a single schedule.
Phasing	Occupancy numbers described, spatial sequence not fixed by an approval plan.	Cannot confirm infrastructure and safeguards precede each phase.
Operational model	High-level plan; provider not appointed; significant public omissions/redactions.	Travel, visitor, welfare, health, complaints, safeguarding and community effects depend on operation.
Transport / access	No agreed pedestrian scheme; access roles and speed limit conflict; shuttle details incomplete.	Safety and sustainable movement cannot be judged or secured.
Foul water	Interim tankering; public-sewer capacity unconfirmed; on-site works not designed / permitted.	A feasible, phase-specific disposal route is fundamental.
Surface water	CCTV, modelling, infiltration and detailed design outstanding; published assumptions conflict.	Flood safety, greenfield rates, SSSI protection and maintenance unproven.
Power / energy	Existing capacity / configuration unknown; generators anticipated; feasibility deferred; high power line running through site	Noise, air quality, carbon, resilience and delivery remain unclear, impacts upon resident heath.
Waste	Only general / recyclable separation stated; no quantities, compounds, collections or specialist streams.	Servicing, odour, pests, amenity, public health and circular-resource effects cannot be assessed.
Ecology / trees	Multiple species surveys and arboricultural impact assessment deferred.	Layout could prejudice avoidance and mitigation; BNG position unclear.

Topic	Published position	Why is this important?
Contamination / UXO	Preliminary assessments recommend targeted intrusive work and further risk assessment.	Suitability of sleeping accommodation and construction method not fully demonstrated.
Fire / emergency	Strategy without fixed layout, building specifications or access/hydrant plan.	Fire spread, evacuation capacity and emergency access cannot be verified.
Landscape / lighting / security	No detailed building, lighting, fencing, CCTV, plant or landscape plans.	The qualified landscape conclusion cannot be applied to the full envelope.

12.4. A parameter-led approval is not objectionable in principle. The flaw is that the parameters must be precise enough to constitute a coherent maximum scheme and every assessment must test the same envelope. Conditions can then control detail within it. Here, the applicant's own Urban Design response describes the proposal as outline in nature, while the application seeks full permission and no subsequent reserved-matters process is identified. Discharge of conditions is not a substitute for public scrutiny of the development's basic form.

12.5. Redaction does not explain the absence of ordinary proposed plans. A general layout showing development parcels, routes, buffers, drainage areas, open space and heights can ordinarily be prepared without publishing sensitive security specifications. If any omitted spatial information is genuinely sensitive and material, the Council asks the Secretary of State to confirm that the unredacted information has been assessed, to appoint an appropriately cleared independent adviser, and to publish a non-sensitive summary of the conclusions and controls.

13. RESPONSE TO CONSULTATION

13.1. The following consultees responded to CDC Planning to inform this Committee Report and give a more comprehensive review of the proposals being considered.

CDC Landscape

13.2. No objection in principle, subject to the assessed height and development parameters, retention of screening vegetation and a detailed mitigation and management condition. Assessment is qualitative and limited by absence of layout.

CDC Urban Design

13.3. Satisfied that contextual and functional requirements have been considered 'at this outline stage'; notes general principles only.

CDC Waste Management

13.4. Cherwell's commercial waste service can provide both general waste and recycling collections for the site if required. However, no details have been provided regarding waste storage capacity, collection arrangements, or how recyclable materials will be segregated and managed on site.

CDC Ecology

13.5. The Preliminary Ecological Appraisal and its initial conclusions are considered appropriate at this stage. However, the ecological records search appears incomplete, with omitted records including badger within 500m, great crested newts within 200m, priority plant species and several notable butterfly species within 1km, including records from the site itself. Further surveys are required for hazel dormouse, barn owl, breeding birds, great crested newts, reptiles and terrestrial invertebrates. District-level licensing may provide an alternative approach for great crested newts, while pre-construction checks are likely to be sufficient for badger and water vole. An updated habitat and botanical survey should also be undertaken at an appropriate time of year. The results must inform the design and ensure that impacts are avoided or mitigated in accordance with the mitigation hierarchy.

13.6. The site access lies within a Local Nature Recovery Strategy recovery zone, while the wider site adjoins both that zone and the Ray Conservation Target Area. Landscaping should respond to the objectives of these areas, with wide hedgerow buffers and planting designed to support butterflies and other invertebrates. A lighting strategy should follow BCT/ILP Guidance Note 08/23, and the effects of intensive recreation on retained habitats must be considered. Natural England is satisfied that a final drainage strategy could avoid hydrological effects on Arncott Bridge Meadows SSSI, although ecological monitoring and provision for remedial action are also recommended.

CDC Environmental Protection

13.7. Environmental Protection raises no objection to the methodology or findings of the submitted Noise Assessment or Air Quality Assessment. However, a Stage 2 noise assessment and acoustic design statement would be required to inform the detailed layout, with accommodation positioned within lower-risk areas away from the road wherever practicable and any necessary mitigation installed and maintained. A Demolition and Construction Environmental Management Plan should also be secured to control noise, dust and other construction effects and to establish arrangements for consultation and communication with nearby occupiers.

13.8. A full assessment of land contamination cannot be made because the submitted report is redacted. Given the site’s former military use, a staged investigation, remediation and verification process should therefore be secured, including specific assessment of potential PFAS contamination. Details of all external lighting should

also be submitted for approval to prevent unacceptable light spill or disturbance to sensitive premises. No concerns are raised in relation to odour.

Piddington Parish Council

13.9. Piddington Parish Council has formally resolved to object and requests that Cherwell District Council and Oxfordshire County Council maintain a formal objection to the Secretary of State. The Parish Council stresses that Piddington is directly affected by the location and scale of the proposal and that Cherwell's role carries particular importance under the Urgent Crown Development procedure. The application will be determined directly by the Secretary of State without an Inspector, hearing or inquiry. Cherwell's response will therefore be one of the principal sources of independent local planning evidence available to the decision-maker. The Parish Council also notes that no engagement took place with the District Council before the proposal was publicly announced.

13.10. The Parish Council disputes the applicant's assertion that there is no statutory requirement to consider compliance with the development plan. It refers to Planning Practice Guidance, which states that Crown Development applications should be determined in accordance with the development plan unless material considerations indicate otherwise. It considers that the submitted Planning Proposal Statement lists relevant policies without properly applying them to the development. Specific concerns include the omission of Policy Villages 1, given that the site lies outside and does not adjoin a settlement in the hierarchy; the effect of service vehicles, coaches, minibuses and foul-effluent tankers on unsuitable rural roads under saved Policies TR7 and TR10; and the lack of assessment of the perceived separation between Piddington, Upper Arncott and Ambrosden under saved Policy C15. Further concerns relate to water efficiency, the absence of BREEAM and energy evidence, the deferral of renewable-energy and combined heat and power assessments, the absence of LLFA approval for drainage, uncertainty over water resources, outstanding ecological surveys and the failure to demonstrate infrastructure capacity.

13.11. The Parish Council accepts that the previously developed nature of the site and the 2003 planning history are material considerations. However, it states that the applicant relies upon the 2003 decision without addressing the preceding Inspector's recommendation for refusal. That permission related to accommodation for 750 people, rather than the 1,256 now proposed, and was never implemented. The Parish Council also notes that Cherwell objected to the subsequent reserved matters on design, lighting and highway-safety grounds before the project was cancelled.

13.12. A central concern is the absence of confirmed infrastructure capacity. The Parish Council states that Bicester Sewage Treatment Works was designed to accommodate planned growth only up to 2026 and that available headroom has not been established. The applicant instead proposes an on-site wastewater treatment works discharging to a watercourse, although no environmental permit application has been made. The condition and capacity of the electrical network are also unknown, with the submitted assessment assuming that the existing infrastructure cannot be relied upon and that generators may be required. No substantive capacity or resourcing confirmation is identified from Thames Water, the Integrated Care

Board, the emergency services or waste providers. Site A is not allocated or identified as an anticipated growth location in the Council's Infrastructure Delivery Plan and has therefore not been tested through the local plan process for development of this scale.

13.13. The Parish Council also objects to the extent to which essential matters are deferred to conditions. These include lighting, foul and surface-water drainage, long-term power provision, contamination, ecology, arboriculture, archaeology, fire safety, construction traffic, operational management and the effects of the proposed wastewater treatment works. It considers that these matters concern whether acceptable and deliverable solutions exist, rather than matters of detail which can safely be resolved after permission is granted. Particular concern is raised that the urgent procedure provides no Inspector, hearing or inquiry through which the subsequent discharge of conditions would receive independent scrutiny. The Parish Council therefore asks Cherwell to undertake a policy-by-policy assessment, require confirmation of infrastructure capacity, object independently to the principle of development at this location and request that information fundamental to the acceptability of the scheme is provided before determination.

13.14. PPC also sent objections to Oxfordshire County Council requesting highway and LLFA objection pending pedestrian, access, trip, routing, drainage, survey, modelling and management information

13.15. PPC also sent a comprehensive formal objection direct to MHCLG / Parliament.

Thames Valley Police - Designing Out Crime (draft response only)

13.16. Raises concerns from a crime prevention, security and community safety perspective. The site is highly rural and isolated, with no suitable pedestrian or cycle connections and very limited public transport. Residents would therefore depend heavily on organised shuttle services. Access is from the unlit B4011, a 50mph rural road on which nine collisions, including one fatal and three serious collisions, were recorded during the five-year period cited. The principal entrance may also become a focus for protest activity, creating potential conflict with construction traffic, staff and other site users. The scale of the proposed accommodation, for up to 1,250 adult males, would be substantial when compared with Piddington, Arncott and Ambrosden, where services and leisure facilities are limited. This raises concerns about the suitability of the location for long-term occupation, social isolation and the concentration of activity within a small number of places.

13.17. The proximity of the accommodation to the site boundary and its visibility from the B4011 could also reduce residents' privacy and increase the risk of observation, filming, harassment, hostile attention or protest. Recommended measures include enhanced perimeter security, increased stand-off distances, landscape screening, physical barriers, defensive design measures and CCTV monitoring. Although shuttle buses would be essential, the concentrated arrival of groups in Bicester, Aylesbury or other centres could create safeguarding, confrontation and community-cohesion concerns. Careful consideration should therefore be given to service frequency and occupancy, staggered travel, destination management and community engagement. Appropriate mitigation would be required to address the

identified privacy, security and community safety risks. The comments relate solely to crime prevention design.

Leader of the Council's letters

13.18. The Leader, Councillor Lesley McLean, wrote to the Home Secretary on 30 June 2026 (referred to in the later correspondence as the letter of 1 July) and again on 29 July. The first letter records that the Council was not consulted before announcement and seeks information on timing, infrastructure, management, movement, catering and activities, healthcare and worship, security and visitors, policing, community impacts, planning route, funding, engagement, cohesion, processing and onward movement.

13.19. The planning assessment independently supports many of the letter's land-use concerns: a facility of this scale requires evidence of healthcare, transport, policing/emergency-service and community infrastructure from first occupation; its operating model must be enforceable; and local people require a meaningful opportunity to understand and comment on the scheme. The report does not adopt partisan or non-planning objections concerning asylum policy itself.

14. RELEVANT PLANNING POLICY AND GUIDANCE

14.1. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

14.2. Although Cherwell District Council is not the determining authority, the Council's response should apply the same plan-led approach to the planning merits. The Secretary of State should take account of all relevant material planning matters when determining an Urgent Crown Development application. The adopted development plan remains the Council's local planning framework and is a material basis for its consultation response. The applicant's statement that there is no statutory requirement to consider development-plan compliance should not be read as permission to assess the proposal disregarding the Development Plan. Even if the urgent statutory route modifies the ordinary decision framework, Government guidance requires all relevant planning matters to be explored, and the Development Plan is the principal expression of locally tested land-use policy.

14.3. The Cherwell Local Plan 2011-2031 - Part 1 was formally adopted by Cherwell District Council on 20th July 2015 and provides the strategic planning policy framework for the District to 2031. The Local Plan 2011-2031 – Part 1 replaced a number of the 'saved' policies of the adopted Cherwell Local Plan 1996 though many of its policies are retained and remain part of the development plan. The relevant planning policies of Cherwell District's statutory Development Plan are set out below:

<u>CHERWELL LOCAL PLAN 2011-2031 PART 1 (CLP 2015)</u>

- PSD1 - Presumption in Favour of Sustainable Development
- SLE4 - Improved Transport and Connections

- BSC8 - Securing Health and Well-Being
- BSC9 - Public Services and Utilities
- ESD1 - Mitigating and Adapting to Climate Change
- ESD 2: Energy Hierarchy and Allowable Solutions
- ESD 3: Sustainable Construction
- ESD 4: Decentralised Energy Systems
- ESD 5: Renewable Energy
- ESD6 - Sustainable Flood Risk Management
- ESD7 - Sustainable Drainage Systems (SuDS)
- ESD10 - Protection and Enhancement of Biodiversity and the Natural Environment
- Policy ESD 11: Conservation Target Areas
- ESD13 - Local Landscape Protection and Enhancement
- ESD15 - The Character of the Built and Historic Environment
- ESD17 - Green Infrastructure
- INF1 – Infrastructure

CHERWELL LOCAL PLAN 1996 SAVED POLICIES (CLP 1996)

- TR1 - Transportation funding
- TR7 - Development attracting traffic on minor roads
- C5 - Protection of ecological value and rural character of specified features of value in the District
- C8 - Sporadic development in the open countryside
- C28 - Layout, design and external appearance of new development
- ENV1 - Development likely to cause detrimental levels of pollution
- ENV12 - Development on contaminated land

14.4. The Cherwell Local Plan Review 2042 was submitted for examination on 31 July 2025 and remains an emerging plan. Its relevant spatial, transport, healthy-community, climate, design, infrastructure and environmental policies may be given weight in accordance with NPPF policy DM4, having regard to their stage, unresolved objections and consistency with national policy. It does not displace the adopted plan at this stage.

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14.5. The current National Planning Policy Framework is the August 2026 edition, not the earlier edition relied upon in the July Planning Proposal Statement. Particularly relevant are:

- DM1–DM3 (engagement, information and decisions);
- S3 and S5 (sustainable development and development outside settlements);
- DP3 and DP4 (well-designed places and design process);
- TR6 (transport evidence and impacts);
- HC3 and HC4 (community/public-service infrastructure and health);
- P2–P5 (ground conditions, pollution, existing activities, safety and security);
- F4–F8 (flood risk and SuDS); and the natural and historic environment policies.

14.6. NPPF policy HC3 is directly engaged because the proposal would bring significant numbers of additional people to the area. It requires an understanding of associated community facilities and public-service infrastructure and provision of what is necessary, available by first occupation. Policy HC4 supports demonstrable health benefits and proactive collaboration. Policy DM3 expressly recognises insufficient information and public-safety risk as reasons why a decision may need to await advice.

14.7. OTHER MATERIAL PLANNING CONSIDERATIONS

- National Planning Policy Framework (December 2024, as amended February 2025)
- Planning Practice Guidance, including Crown Development and Urgent Crown Development guidance
- Town and Country Planning Act 1990, sections 293B-293C (Urgent Crown Development)
- Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025
- Cherwell Residential Design Guide SPD (2018), where relevant to general design principles
- Oxfordshire Local Transport and Connectivity Plan and current parking/street design guidance
- Conservation of Habitats and Species Regulations 2017
- Natural Environment and Rural Communities Act 2006
- Environment Act 2021 / biodiversity net gain requirements, subject to application-specific applicability
- Human Rights Act 1998
- Equality Act 2010, including the Public Sector Equality Duty
- Planning Practice Guidance on urgent Crown development;
- Cherwell's March 2024 Local Validation Requirements, reviewed in March 2026;
- the Cherwell Landscape Character Assessment 2024;
- the Oxfordshire Wildlife and Landscape Study;
- Healthy Bicester;
- Oxfordshire Marmot Place; and
- the Council's Climate Action Plan 2026–2027

14.8. CORPORATE HEALTH, CLIMATE AND PLACE-SHAPING CONTEXT

14.9. Cherwell declared a climate emergency in 2019, committed its own operations to net zero by 2030 and supports a carbon net-zero district. The Climate Action Plan 2026–2027 states that sustainability should be embedded across services and strategic decision-making. Its district goals include planning for biodiversity and climate resilience, reducing transport emissions, reducing waste and resource use, supporting low-carbon energy, climate adaptation, nature recovery and collaboration.

14.10. Healthy Bicester grew from Bicester's designation as an NHS Healthy New Town in 2016 and continues as a district-wide healthy place-shaping programme. It links the built environment, community activation and new models of care, including active travel, access to green space, social connection and health infrastructure. Oxfordshire became a Marmot Place in 2024, committing local bodies to address the social determinants of health and unequal access to healthy living conditions and services, including rural inequality.

14.11. These corporate programmes are not development-plan policies and do not create freestanding reasons for refusal. They do, however, illuminate the practical application of adopted Local Plan BSC, ESD and INF policies and NPPF DP3, HC3 and HC4. A scheme housing a potentially vulnerable population in a poorly connected rural location should demonstrate, rather than assume, healthy accommodation, safe movement, access to nature and activity, primary and mental-health care, social connection and no disproportionate transfer of impacts to nearby communities.

15. APPRAISAL

15.1. The key issues for consideration in this case are:

- Procedural context and the scope of the Council's response
- Principle of development, national need and the planning history of Site A
- Location, accessibility and sustainability
- Design, scale, layout, landscape and visual impact
- Highway safety, traffic, parking and sustainable transport
- Community impact, residential amenity, public safety and security
- Health, emergency services, utilities and other infrastructure
- Ecology, biodiversity net gain, trees and green infrastructure
- Flood risk, drainage and water environment
- Contamination, ground conditions and unexploded ordnance
- Human rights and equalities
- Planning balance and recommended response

Principle of development, national need and planning history

15.2. The site is previously developed former military land and has twice been the subject of substantial Home Office accommodation proposals. The 2003 Secretary of State decision is particularly relevant because national need and the reuse of previously developed Site A were afforded substantial weight despite acknowledged concerns about the rural location and sustainability. The current proposal must nevertheless be assessed on its own facts and under the current development plan and NPPF.

15.3. The Home Office considers that the proposal meets several of the criteria for nationally important development identified in the Written Ministerial Statement of 13 February 2025. It states that accommodating eligible destitute asylum seekers is a national public service arising from the Secretary of State’s statutory responsibilities under the Immigration and Asylum Act 1999. The asylum

accommodation estate is said to remain under sustained pressure because of historically high and fluctuating levels of demand, limited dispersal accommodation and continued reliance on hotels. The Home Office argues that any significant shortfall in capacity could affect human welfare, place additional pressure on public services and, during periods of increased arrivals, potentially amount to a civil emergency.

15.4. The Statement further argues that these pressures cannot be managed effectively at a local level and require a coordinated, flexible national accommodation estate. The Bicester site would provide up to 1,256 bedspaces as a controlled and self-contained element of that estate, with the ability to respond to changing demand and provide surge capacity. Its former military use, existing hardstanding, defined boundaries, gated access, modular construction and proposed on-site services are cited as supporting rapid and secure delivery while reducing reliance on hotels and the associated operational, safeguarding, community cohesion and public-order risks. On this basis, the Home Office considers that the proposal would contribute to a national public service, support the response to national pressures and have a strong public interest at a national level.

15.5. A key distinction from the 2008 IRC proposal is that the present use would be open asylum accommodation rather than detention. Residents would be able to leave the site. This increases the relevance of accessibility to services, walking/cycling conditions, public transport, managed transport, community interaction and the infrastructure capacity of nearby settlements.

15.6. The proposal would reuse previously developed Crown land in an established military / prison context. Reuse of hardstanding and a temporary modular approach could limit land take and construction impacts. National need and the public service performed by the Home Office are substantial material benefits. The 2003 and 2010 permissions show that accommodation uses have previously been accepted in principle when supported by defined proposals and mitigation.

15.7. Against that, Site A lies outside a settlement in a rural location not allocated for this use. The nearest villages have limited facilities, pedestrian connections are poor, and the present non-detained use would generate a different relationship with surrounding communities from the earlier secure proposals. The applicant's assertion that self-containment means the location is not a material constraint.

15.8. The development would be operational for ten years, but the national-importance statement describes later expansion as a long-term accommodation solution and the EIA screening assumes at least ten years with potential extension, treating permanent operation as a worst case. Ten years is a substantial period in the life of the affected communities. Temporary permission reduces permanence but does not reduce the need for safe access, infrastructure and acceptable living conditions throughout that period.

15.9. The Council cannot reach a positive conclusion on principle until it understands the physical design parameters of scheme, the number and turnover of residents in each phase, the operating model, layout level, and whether necessary infrastructure will exist before occupation. On present evidence, national benefits do not overcome the policy conflict and unresolved site-specific effects.

Community, Health, Wellbeing, Safety And Equalities

Piddington, Upper Arncott and Cumulative Daily Activity

15.10. The proposed maximum population of 1,256 is substantial relative to the nearby rural settlements. Piddington and Upper Arncott are foreseeable destinations because they are the nearest communities and lie within practical walking range, even if Bicester or Aylesbury are intended to be served by shuttle. The planning assessment must address ordinary, repeated behaviour rather than an unrealistic single mass movement.

15.11. The likely pattern includes individuals and small groups leaving and returning throughout the day and evening, attending shops, places of worship, recreation, services or transport, or simply walking. Effects may be individually modest but cumulative: pedestrian exposure on unlit roads; use of village verges, paths and public spaces; litter and waste; pressure on limited shops, community facilities and transport; noise or disturbance; informal interactions; policing and community-safety demands; and residents' perception of safety and cohesion. These effects must be assessed objectively and without stereotyping future occupiers.

15.12. The application provides no quantified pedestrian-distribution assessment, desire-line plan, time-of-day profile, sensitivity testing for shuttle failure/capacity, or community-facilities audit for Piddington and Upper Arncott. A sign-in / sign-out system records movement but does not prevent it, remove highway risk or demonstrate where people will go. Advice, high-visibility vests and encouragement to use a shuttle are not a safe pedestrian network and are considered to be a meaningless exercise that will not deviate natural behaviour and curiosity.

15.13. A Community Impact and Cohesion Plan should be agreed before determination or, at minimum, before any occupation pursuant to a demonstrably feasible scheme. It should be based on engagement with parish councils, Hillside Park residents, local organisations and service providers; identify likely patterns and sensitive locations; define a staffed liaison and complaints service; establish behavioural/orientation support for all parties; manage protest and misinformation risks; fund necessary mitigation; and contain transparent monitoring, publication and review triggers.

Health and Public-Service Infrastructure

15.14. The submitted case refers to space for on-site healthcare and states that nearby practices are under capacity. It does not provide a commitment from the Integrated Care Board, named provider or GP / dental service; staffing levels and hours; mental-health, trauma, suicide/self-harm, pharmacy, infectious-disease and dental arrangements; patient transport; emergency pathways; or the effect on ambulance, community hospital and acute services. Space is not the same as a commissioned service.

15.15. The EIA screening recognises that service users may have a disproportionate prevalence of physical and mental-health needs and that emergency services may

experience additional demand. NPPF HC3 requires necessary services to be available by first occupation. The Healthy Bicester and Marmot Place context reinforces the need to address rural access, inequalities, activity, isolation, healthy food and social connection for service users while ensuring existing residents are not displaced from care.

15.16. Before permission, the Home Office should secure written positions from the relevant health commissioners and providers, UKHSA, ambulance service, fire and rescue service and Thames Valley Police. The evidence should state the service specification, funding, recruitment, escalation and contingency arrangements for every phase. General assurances that the site will be self-contained or that other regulatory regimes apply cannot replace this land-use capacity assessment.

Safety, Security and Equality

15.17. Security is a material design and operational matter insofar as it affects site users, neighbours, public space, traffic, lighting, protest management and emergency services. Fear of crime without evidence is not a reason for objection. Equally, the possibility of protest, disorder and harm to service users and residents is identified in the Government's own screening statement and requires a proportionate, coordinated response.

15.18. The Equalities Impact Assessment is relevant but cannot be tested against an absent layout and incomplete operating plan. Detailed design must provide accessible accommodation and routes, privacy, daylight, ventilation, safe recreation, quiet and faith space, dignity, safeguarding and reasonable adjustments. The Council expects the Secretary of State to discharge the Public Sector Equality Duty on current, site-specific evidence and to explain how impacts on all protected groups have been considered.

Access, Movement and Transport

15.19. The site is car-dependent and lacks a safe direct walking/cycling connection. The northern access has no footway or lighting; the southern route is described as having narrow and incomplete pedestrian provision. The documents conflict on the speed limit. People living at a non-detained site will be free to walk, and their foreseeable choice to do so must be designed for, not treated as a breach of an operational aspiration.

15.20. The transport evidence is based in part on experience at another accommodation site and does not quantify service-user pedestrian trips or destinations. It does not fully assess evening and weekend activity, small-group movements, shuttle queuing and failure, visitor and taxi trips, construction overlap between phases, wastewater tankers, waste vehicles, generator fuel, emergency access or cumulative development at HMP Bullingdon. The EIA screening itself records 192 daily service-vehicle movements and an unknown number of shuttle trips.

15.21. The access strategy is not consistent; documents refer variously to the northern access as operational and the southern access as construction / emergency, while local representations understand a different arrangement. Swept-path material does not demonstrate every relevant B4011 / Widnell Lane movement or the routing of foul-water tankers and modular HGVs. The relationship with the 2010 routing agreement associated with 08/02511/F should be clarified.

15.22. Until OCC provides a substantive response on the final layout and operating assumptions, the Council cannot conclude that access is safe or that residual cumulative network impacts are acceptable.

15.23. Required evidence comprises: an agreed access and movement plan; Road Safety Audit where appropriate; continuous safe pedestrian and cycle connections or a clearly evidenced alternative; speed-limit and crossing assessment; quantified multi-modal trip generation for construction and operation; routing plans; delivery and service booking; phase overlap and HMP cumulative analysis; shuttle destinations, capacity, frequency, hours, accessibility, funding and backup; staff travel; taxi and visitor arrangements; monitoring targets; remedial triggers; and enforceable delivery before first occupation.

Design, Living Conditions, Landscape, Lighting and Heritage

Full Application / Outline Information Mismatch

15.24. Good design cannot be established from generic intentions alone. There is no plan showing how 600 accommodation modules and numerous welfare, kitchen, ablution, healthcare, staff and plant modules are arranged. The statement suggests only one metre between single-storey units and two metres between double-stacked units to obtain side-window daylight. Without plans, orientation, window positions, privacy, outlook, ventilation, overshadowing, fire separation, crowding, defensible space and accessible routes cannot be assessed.

15.25. The Urban Design Officer's conclusion is expressly confined to an outline stage. It supports the broad principles of contextual response and self-containment but cannot be treated as endorsement of a full scheme that has no layout or elevations. The Secretary of State should require a design code and fixed plans at decision stage, not leave the complete place to post-permission approval without reserved-matters consultation.

Height and Landscape

15.26. The most serious design and landscape inconsistency is the height envelope. The Parameters Plan permits operational development up to 12 metres. The EIA screening was expressly undertaken on a maximum two-storey or 6-metre modular scheme. The Planning Proposal Statement's landscape conclusion also says the modules would be no greater than 6 metres. A 12-metre building has a materially different bulk, skyline, lighting, plant and visibility effect from a 6-metre module, especially if sited near the edge of the broad zone.

15.27. The Council's Landscape Officer finds no objection in principle because the site is developed and vegetated, but states that the conclusion relies on the buildings remaining within the assessed height and development parameters and retaining principal vegetation. That advice can support a scheme capped at, located within and mitigated to the envelope actually assessed. It cannot alleviate a plan that doubles the assessed height. The plan should be amended to a 6-metre maximum for accommodation and building-specific justified limits for exceptional plant, or a new landscape/visual assessment and EIA review should test the full 12-metre worst case.

15.28. A detailed landscape and arboricultural scheme must identify retained trees and hedges, root-protection areas, removals, construction protection, new native and climate-resilient planting, exposed edges, management and replacement. It must be coordinated with security sightlines, fencing, lighting, utilities, drainage, access and easements. Vegetation relied upon for screening should be retained for the permission period and during restoration.

Lighting, Security Infrastructure and Amenity

15.29. No lighting assessment tied to a layout has been supplied. 24-hour operation, pedestrian routes, parking, compounds, CCTV, perimeter security and emergency access are likely to require substantial lighting. The 2005 objection demonstrates local sensitivity to night-time intrusion and driver distraction. A scheme must show column/building positions, heights, luminaires, colour temperature, hours, controls and horizontal/vertical lux contours at ecological, residential, highway and landscape receptors, with a dark-sky curfew and emergency override where safe.

15.30. Fencing, gates, cameras, anti-climb measures, generator compounds, substations, water tanks, wastewater plant, rooftop equipment, signage and temporary structures form part of the development's appearance. They cannot be assessed as invisible ancillary detail. Sensitive security specifications may be withheld, but their physical scale, siting and environmental effects require open or independently reviewed evidence.

Heritage and Archaeology

15.31. The site has no designated asset, but listed buildings in Piddington and known archaeological potential lie nearby. The desk-based assessment finds moderate-to-high potential for unrecorded remains and recommends monitoring where hardstanding is disturbed. Without a fixed layout and foundation and drainage design, the extent of disturbance is unknown. The County Archaeologist's position and a proportionate written scheme of investigation should be obtained before ground disturbance is authorised.

<u>Climate, Energy, Waste, Water, Flooding, Ecology and Land Quality</u>

Climate and Energy

15.32. The proposal's temporary modular character could reduce construction time and enable components to be reused. No quantified whole-life carbon, operational-energy or overheating assessment has been supplied. The Planning Proposal Statement says low-carbon technologies and CHP / district-heating feasibility will be considered later. For 17,935m^2 of floorspace operating continuously for ten years, feasibility should inform the current proposals.

15.33. The existing electrical network's condition and capacity are described as unknown, and the proposal assumes it cannot be relied upon. Generator compounds are anticipated. Their number, fuel, duty cycle, emissions, noise, storage, refuelling traffic, resilience and transition to grid and renewable power are not fixed. The relationship with overhead high-voltage infrastructure and required safety clearances should be shown. An Energy and Sustainability Statement should apply the energy hierarchy, quantify regulated and unregulated demand and carbon, assess passive design, heat pumps, solar PV/storage, grid connection, backup generation, water efficiency and decommissioning/reuse.

15.34. Cherwell's climate commitments do not add an independent legal standard, but they reinforce adopted ESD1–ESD5 and NPPF DP3. A 'temporary' label is not a reason to lock in high-carbon generators or omit climate adaptation, particularly where the ‘temporary’ could mean ten years if not longer term.

Waste and Resource Management

15.35. The entire operational-waste case in the Planning Proposal Statement is that recycling will not occur on site and waste will be separated into general and recyclable streams. There are no quantities or collection frequencies for a population of 1,256 plus staff; no layout or capacity for compounds; no treatment of food, clinical, sanitary, pharmaceutical, bulky, hazardous, electrical or confidential waste; no kitchen-grease or pest controls; and no provider or highway evidence. Sludge and screenings from the wastewater plant are also unaddressed.

15.36. Construction and demolition waste information is similarly insufficient for five Nissen huts, asbestos-containing material, concrete and hardstanding, excavated soil, foundations, drainage and eventual decommissioning. A Site Waste and Materials Management Plan should set a hierarchy of prevention, reuse, recycling and disposal; quantify streams; identify licensed routes/facilities; control asbestos and contaminated arisings; establish collection routing and timing and compound design; and demonstrate how modular units will be reused or responsibly removed at the end of the permission.

Foul Water and Wastewater Treatment

15.37. The final foul-water strategy is not confirmed with existing sewers and pump capacity are uncertain. Initial occupation may depend on cesspool storage and tankering, but the submitted drainage material states that tankering is not viable at full occupancy. Bicester Wastewater Treatment Works is mentioned as a possible receiver subject to capacity; no written acceptance is provided. The longer-term alternatives include public-sewer connection, or a new on-site treatment works and outfall, but the

design, receiving water, land rights, permit, odour and noise control, sludge removal, flood resilience and construction programme are absent.

15.38. Natural England's satisfaction for EIA-screening purposes with a described interim approach is relevant to likely significant effects on the SSSI; it is not proof that a lawful and operationally resilient scheme exists for every phase. Before permission, Thames Water and the Environment Agency should confirm the feasible route, capacity and permit position. Each phase must be capped to commissioned capacity, with storage, alarms, dual pumps/power, emergency retention, interruption and spill response, tanker frequency/routing and no occupation until the relevant permanent or interim system is operational.

Surface Water and Flood Risk

15.39. The flood baseline is internally inconsistent. The Flood Risk Assessment says no flooding has been recorded, while the Drainage Design Statement records the MOD site team's account of frequent surface-water flooding, failed and unverified pumps, blocked drains and poor maintenance, and the Utilities Assessment records ponding even in dry conditions. These statements may use different areas or definitions, but they must be reconciled on a single plan.

15.40. The EIA screening relies on no new hardstanding and greenfield runoff. The Drainage Design Statement identifies the lowest Phase 1 area as lacking suitable attenuation, so restriction to greenfield rates is not currently achievable, and refers to approximately 440m^2 of new impermeable drop-off area without greenfield control. It also defers CCTV survey, levels, hydraulic modelling and final outfalls. The Secretary of State and Natural England must be asked whether their conclusions remain valid for the design actually proposed.

15.41. Sleeping accommodation of this nature requires a cautious vulnerability classification under NPPF Annex F. The applicant should identify the classification relied upon, undertake any required sequential assessment, and overlay every building, escape route, critical plant, attenuation feature and finished level with fluvial and surface-water extents including climate change. Safe access/egress, exceedance routes, pump failure, no increased risk elsewhere and long-term maintenance must be demonstrated and agreed by the LLFA before determination.

Ecology, Biodiversity and Trees

15.42. The preliminary appraisal identifies potential for badger, dormouse, bats, nesting birds, great crested newt, reptiles and invertebrates and lists further surveys. The site adjoins a Conservation Target Area and is in an SSSI impact-risk zone. The applicant proposes to use later surveys to inform a future masterplan and mitigation. That reverses the mitigation hierarchy: survey results should first inform where development, access, drainage and lighting can be located and is direct opposition to how the Government requires development proposals to proceed. The season for surveys is ending as of Autumn 2026 so any reports would likely need to be undertaken in Spring / Summer of 2027.

15.43. Natural England's August 2026 advice referred to in the screening statement, and the information on which it relied, should be published where non-sensitive. The applicant should clarify whether the statutory biodiversity-gain condition applies to this urgent Crown proposal and provide the required baseline, metric, habitat plan and long-term arrangements if it does. Whether or not mandatory BNG applies, adopted ESD10 / ESD11 require avoidance, mitigation and proportionate enhancement.

Contamination, Asbestos and Unexploded Ordnance

15.44. The former military use, made ground, asbestos-containing materials and former munitions handling are material to land suitability, especially for sleeping accommodation and outdoor recreation. The preliminary geo-environmental report recommends targeted intrusive investigation and asbestos surveys; the UXO report does not rule out UXO and allows for a detailed risk assessment. NPPF P2 expects adequate site-assessment information from a competent person before these judgments are made.

15.45. A phase-specific investigation strategy should distinguish evidence necessary before permission from detail before works. At minimum, the decision-maker needs evidence that remediation and safe construction are feasible without unacceptable effects on groundwater, drainage, ecology or programme. No accommodation phase should be occupied until investigation, remediation, verification, unexploded-ordnance measures and asbestos removal relevant to that phase are complete and independently reviewed.

<u>Fire, Emergency Access, Noise, Air Quality and Infrastructure</u>

15.46. The Fire Strategy is necessarily generic because building positions, heights, uses, compartmentation, external wall build-ups, separation, escape distances, assembly points, hydrants, water supply and appliance routes are not fixed. One- and two-metre module separations discussed for daylight cannot be assumed to provide fire separation. A competent fire and rescue response is required on the proposed layout before permission, with independent fire-service consultation and without sole reliance solely on later Building Regulation compliance.

15.47. Noise and air-quality effects arise from construction, demolition, traffic, generators, wastewater plant, pumps, HVAC, kitchens, public address systems, outdoor recreation and people. Submitted conclusions rely on future siting, modern plant and management measures. A fixed layout and cumulative assessment are required, including HMP Bullingdon, evening/night operation and sensitive users on and off site. Conditions can then secure equipment limits, acoustic treatment, hours and monitoring.

15.48. Water-supply capacity, electricity connection, telecommunications, fire water, emergency planning, policing, ambulance, healthcare and waste collection are each assumed rather than supported by provider commitments. The existence of a possible technical solution does not show it can be delivered before occupation.

NPPF HC3 and INF1 require the timing and capacity of necessary infrastructure to be demonstrated and secured.

15.49. The request to retain broad permitted-development rights for Crown operational and emergency development also requires care. Uncontrolled later buildings, security works, plant or hardstanding could defeat the assessed envelope. Any permission should remove or tightly limit relevant rights to the extent lawfully possible and require approval for material changes, while recognising genuinely necessary emergency powers.

15.50. Information Required Before Determination

15.51. The Council requests the following consolidated package. It should be a unified scheme, distinguishing open from genuinely sensitive material and be followed by a further reasonable representation period.

Definition and design

- A proposed site / masterplan fixing each phase, building and compound use, footprint, access, road, footpath, parking, servicing, open space, drainage, landscape buffer and retained feature.
- Proposed floor plans, elevations, sections, finished levels, roof and plant plans and a schedule of use, capacity, floor area and maximum height for every component.
- An amended parameter plan capped at the 6 metre envelope assessed, or new EIA and landscape and design evidence for every higher element; a design code controlling massing, materials, colour, reflectivity, accessibility and living conditions.
- A reconciliation of the areas involved (17,350 or 17,935m^2), the full status of all elements and the mechanism for public scrutiny of any later design approval.

Urgency and engagement

- A current timetable, or critical-path programme, first-occupation dates and quantified consequences of a proportionate information / reconsultation period, explaining the missed July / August assumptions.
- A statement of pre-application engagement, issues raised, scheme changes and continuing community/parish involvement.

Operation, community and services

- A full enforceable Operational Management Plan, with non-sensitive movement, visitor, staffing, welfare, health, safeguarding, recreation, worship, complaints, incident and decommissioning provisions.

- A Community Impact, Cohesion and Liaison Plan based on assessment of Piddington, Upper Arncott, Hillside Park and other receptors, including daily small-group movement and monitoring and remedial triggers. This should include a methodology of how movements to and from the site will be monitored and controlled, if a sign-in, sign-out remit is considered the appropriate direction for the site.

- Written, costed and phase-specific commitments from health commissioners and providers, police, fire, ambulance and other affected public services, operational from first occupation.

Transport

- OCC-agreed transport assessment/travel plan using site-specific multi-modal evidence and reasonable scenarios, including all construction, tanker, waste, fuel, service-user, staff, visitor and taxi and HMP cumulative movements.

- A safe access, pedestrian and cycle strategy, speed/crossing evidence, access-role reconciliation, swept paths and routing agreement review.

- A funded shuttle specification with destinations, frequency, hours, capacity, accessibility, backup and monitoring.

Water, drainage and flood

- A phase-specific foul strategy with written receiving capacity, outfall / land-rights / permit position, treatment-works design, tanker calculations and failure contingencies.

- CCTV survey, levels, infiltration and ground tests, hydraulic model, greenfield-rate / storage/treatment design, exceedance and maintenance plan agreed by the LLFA.

- A reconciled flood baseline, vulnerability/sequential-test position and overlay of all development, routes and critical plant; reconciliation with the EIA screening and Natural England advice.

Environment and safety

- Completed seasonal ecology surveys, arboricultural impact assessment, BNG clarification and metric, lighting assessment and integrated landscape and ecology plan.

- Phase-specific contamination, asbestos and UXO investigation sufficient to establish feasibility, with remediation and verification strategy.

- A layout specific fire strategy, emergency access and hydrant plan and fire-service response; noise, odour and air-quality assessments for all plant and activities.

- Details and methodologies of the decommissioning and restoration following cessation of activities on the site and relevant timescales.

Climate, energy and waste

- An Energy and Sustainability Statement with energy hierarchy, whole-life carbon, overheating, water efficiency; grid, renewables and heat-pump feasibility; generator impacts and resilience.

- An operational and construction and decommissioning waste and materials plan quantifying all ordinary, food, clinical, sanitary, hazardous, asbestos, sludge and demolition streams and collection routes.

Consultation and security

- Publication of all non-sensitive additional information and material August Natural England correspondence; confirmation of what sensitive information has been reviewed.

- Appointment of a security-cleared independent planning adviser where withheld information is material, with a publishable summary and a renewed representation period.

Protective Controls if the Secretary of State Is Minded to Approve

15.52. These controls are a fallback and do not overcome the pre-determination deficiencies. These are very high-level considerations and final wording should be settled with CDC, OCC and relevant consultees prior to determination, satisfy the six tests for conditions and identify the authority responsible for discharge and enforcement.

Defined permission

Approved plans and schedule fixing the red line, phases, population, floorspace, building-specific heights and all operational development; no deviation outside an agreed minor-change protocol. Any permission should include an enforceable occupancy cap, appropriate monitoring mechanisms (including monitoring fee) and a clear restoration and decommissioning strategy.

Time and restoration

Ten-year cessation date, no extension without fresh permission, phased decommissioning, removal of modular buildings/plant/hardstanding not retained, land restoration and aftercare.

Phased occupancy caps

No phase occupied above its approved cap or before every transport, foul/surface-water, health, fire, power, waste, landscape and management prerequisite for that phase is operational.

Height

Accommodation capped at 6 metres unless a higher identified element has been fully assessed and approved; no blanket 12 m allowance.

Design approval

Detailed layout, elevations, materials, living conditions, accessibility, privacy, daylight and ventilation, recreation, refuse, plant and signage approved before relevant construction.

Operational management

Full plan approved before occupation; staffing, resident movement support, visitors, safeguarding, healthcare, welfare, noise, complaints, liaison, incidents and review; binding on replacement providers.

Community liaison

Pre-occupation liaison group, 24/7 contact, published response standards, regular public monitoring and specified review/remedial triggers.

Transport

Physical access and pedestrian network, funded shuttle and travel plan before occupation; CTMP, routing, delivery booking, tanker/waste/fuel controls, monitoring and corrective measures.

Foul water

No occupation until the relevant permitted system and receiving capacity operate; tankering only within a quantified cap and period, with storage, alarm, power and incident contingency.

Surface water / flood

LLFA-approved SuDS and flood plan before each phase, greenfield rates, treatment, exceedance, pump failure, maintenance and no building/critical route in unacceptable risk areas.

Ecology / trees / BNG

Pre-works surveys, licences, avoidance and mitigation, retained vegetation, construction protection, lighting controls, enhancements and monitoring and management for the required period.

Landscape and lighting

Integrated scheme implementing the Landscape Officer requirements; low-reflectance materials; dark-sky lighting limits, curfew and verified post-installation testing.

Contamination / UXO / asbestos

Investigation, remediation, verification, unexpected-contamination protocol, controlled asbestos removal and UXO measures before affected works/occupation.

Fire and emergency

Approved layout-specific fire and emergency plan, appliance access, hydrants/water, evacuation/assembly, drills and multi-agency review before occupation.

Noise / air / odour

Plant and activity limits, acoustic and odour controls, hours where appropriate, baseline and compliance monitoring, complaints and remedial action.

Energy efficiency and waste

Energy efficiency and low-carbon measures installed before occupation; generators limited and transition plan; waste hierarchy, secure compounds, specialist streams and licensed collections.

Archaeology

Written scheme of investigation, monitoring, reporting and archive before disturbance.

Permitted development

Removal or restriction, insofar as lawful and necessary, of rights that could materially change height, floorspace, hardstanding, plant, security works or environmental effects.

Human rights and equalities

15.53. The Council must have due regard to the Human Rights Act 1998 and the Public Sector Equality Duty under section 149 of the Equality Act 2010 when formulating its consultation response. The assessment should address the effects of the planning proposal on neighbouring communities and on the prospective occupants of the site insofar as those effects are relevant to land-use planning, including accessibility, disability, health, safeguarding, religious/cultural needs and community relations.

15.54. The Human Rights Act 1998 ("HRA") sets out fundamental freedoms which have been laid out by the European Convention on Human Rights ("ECHR"). In making any decisions, Cherwell District Council ("the Council") should have due regard to and take into account any implications that may arise under the HRA. As a public authority, it is unlawful for the Council to act in a manner which is incompatible with the ECHR.

15.55. The rights under the ECHR which the Council views as being the most likely to affect planning matters are: Article 6 (the right to a fair trial); Article 8 (right to respect for private and family life); Article 14 (prohibition of discrimination); and Article 1 of the First Protocol (protection of property).

Article 6

15.56. Officers have considered these matters and have resolved that, whilst there are potential rights in play, these will not be affected by the application due to the application being publicised appropriately giving affected third parties the opportunity to comment on the application and their views taken into account when considering the application. In this case comments and concerns raised by third parties are directed to MHCLG and should be taken into account in assessing the application. Furthermore, should the Council or a third party be concerned about the way the application was decided they could complain to the Local Government Ombudsman or if they question the lawfulness of a decision can appeal to the Courts for Judicial Review of the application.

Article 8 and Article 1 of the First Protocol

15.57. Officers have considered the duties under both Article 8 and Article 1 of the First Protocol and have resolved that the application could potentially interfere with the private and family life of neighbours and, therefore, might fail to protect neighbours' property. Officers consider that this could be in breach of Article 8 / Article 1 of the First Protocol.

15.58. S149 of the Equalities Act 2010 ("EA") sets out what is known as the Public Sector Equality Duty ("PSED"). Under the PSED, the Council, as a public authority, must

have due regard to the need to, inter alia, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and has to foster good relations between persons who share a relevant protected characteristic and persons who so not share it. The protected characteristics to which the PSED refers are: (a) age; (b) disability; (c) gender reassignment; (d) pregnancy and maternity; (e) race; (f) religion or belief; (g) sex; (h) sexual orientation.

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

Environmental Impact Assessment Screening

15.60. The Secretary of State's 26 August direction concludes that the scheme is not EIA development. The Council does not advance the mere absence of an Environmental Statement as a stand-alone objection. It does, however, identify whether the project screened is the project for which permission is sought.

15.61. The screening is explicitly based on accommodation no higher than 6 metres, no additional hardstanding and greenfield surface-water discharge. The approval plan permits 12 metres, and the drainage material describes a new impermeable area and a part of Phase 1 where greenfield restriction is not currently feasible. The screening also assumes mitigations and later designs that are not secured by a fixed scheme. Those differences should be referred back to the Secretary of State for review or an addendum before determination. If the reconciled project could give rise to likely significant effects, the statutory consequences should follow.

16. PLANNING BALANCE AND CONCLUSION

16.1. Substantial weight is given to the national importance of asylum accommodation, the Home Office's statutory functions, operational resilience, reducing hotel reliance, reuse of previously developed land and the potential benefits of modular delivery and on-site services. The Council does not object because of the identity or status of future residents and does not discount the Government's objective of delivery during 2026.

16.2. At present those benefits are attached to a concept rather than a sufficiently defined full development. The broad 12-metre envelope is inconsistent with the 6-metre scheme screened and assessed. There is no proposed layout or architecture. Fundamental foul-water, surface-water, access, health, power, waste, fire, ecology and land-quality solutions remain unproven. The operating model on which community and transport conclusions depend is incomplete. Several effects are proposed to be resolved only after permission, when they may constrain or determine the layout itself.

16.3. The absence of evidence is not automatically proof of harm, but where the applicant bears the burden of describing the proposal and demonstrating acceptable effects,

unresolved ambiguity cannot be treated as a neutral factor. The Council cannot find compliance with the adopted plan or current NPPF, and cannot be satisfied that necessary infrastructure and mitigation are feasible and available by first occupation.

16.4. The claimed urgency does not justify an avoidable risk to occupiers, local communities or the environment. The current programme already differs materially from that used to justify late-August permission. Requiring a coherent scheme, targeted essential evidence and a renewed, reasonable period of consultation is proportionate and consistent with the Government's own urgent Crown guidance.

16.5. The recommended response is therefore a formal objection to the application's determination and any grant of the current scheme. If the Secretary of State supplies and consults on the information in section 15.50, the Council can reassess the balance. If the application is determined without it, the unresolved definition, lack of meaningful detail or assessment and limited feasibility matters justify withholding permission.

17. DRAFT FORMAL RESPONSE TO THE SECRETARY OF STATE

17.1. Cherwell District Council acknowledges the national importance and asserted urgency of providing suitable asylum accommodation and gives substantial weight to the reuse of previously developed Crown land and the objective of reducing reliance on hotels and widespread impacts in established communities across the country. The Council's objection is not to the characteristics or immigration status of prospective occupiers; it concerns the land-use acceptability of the development presented and the level of detail submitted.

17.2. The Council objects to the grant of planning permission on the information presently available. The application does not contain a proposed site layout, floor plans, elevations, sections or levels and therefore does not define the location, scale, form or relationship of the accommodation and essential infrastructure. The broad plan allowing operational development up to 12 metres is inconsistent with the 6-metre development expressly assessed in the EIA screening direction and landscape material. Surface-water assumptions used in screening also conflict with the submitted drainage design material.

17.3. The Council is not satisfied that safe and sustainable pedestrian access, site-specific transport arrangements, foul and surface-water infrastructure, public-service and healthcare capacity, energy, operational and construction waste, fire safety, living conditions, ecology, trees, contamination, unexploded ordnance, lighting, landscape mitigation and the full operational model have been demonstrated. These matters are fundamental to feasibility and should not be transferred wholesale to post-permission conditions.

17.4. The Council requests that the Crown Casework Team uses its power to seek the consolidated information at section 15.50 of this report; publishes non-sensitive additions and the material Natural England advice; appoints an appropriately cleared independent adviser for any material sensitive information; and invites renewed representations for a reasonable period. A revised urgency programme should

explain why adequate scrutiny cannot be accommodated now that the applicant's assumed July submission and late-August permission dates have passed.

17.5. If the Secretary of State is nevertheless minded to grant permission, the Council asks to be consulted on a complete schedule of conditions and obligations incorporating section 15.52. No phase should be occupied before its safe access, commissioned water and drainage, health and emergency-service provision, power, waste, fire, landscape, ecology and management arrangements are operational, and the permission should not contain a general 12-metre height allowance.

LANDSCAPE COMMENTS

To:	Rob Duckworth
From:	Andrew Cox, Consultant Landscape Architect
Date:	9th June 2026
Reference:	26/01833/CROWN Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE
Proposals:	Full planning permission for the temporary change of use of the former defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation. The Proposed Development comprises the retention and change of use of Building A6, the demolition of existing buildings and structures, the erection of new modular accommodation, and the provision of space for associated health and welfare facilities, site infrastructure, wastewater treatment plant, roads, access ways, security infrastructure, parking, staff accommodation and facilities, and open space and recreational areas, to accommodate up to 1,256 service users.

EXECUTIVE SUMMARY

No landscape objection in principle, subject to the landscape and visual assumptions and mitigation measures relied upon in the submitted Landscape and Visual Statement being secured through the detailed design and an appropriately worded planning condition.

The precise location and layout of the proposed accommodation are classified. This consultation response is therefore limited to an in-principle assessment. It does not identify the site, surrounding roads or settlements, public rights of way, viewpoints, development parcels, accommodation capacity or other geographic information that might allow the location to be inferred.

The Landscape and Visual Statement identifies the relevant key characteristics of the applicable landscape character area and considers publicly accessible visual receptors, including users of public rights of way. Existing buildings, infrastructure and mature vegetation exert a strong influence on the immediate context and provide a substantial degree of visual containment. Where the proposals may be perceptible, they would be experienced in the context of an established developed site.

The published forces for change and landscape strategy are not expressly assessed as a separate part of the Landscape and Visual Statement. The subjects most relevant to the proposals, including urbanising influence, retention of landscape features, effects on open views and the treatment of development edges, are nonetheless reflected in the assessment and its proposed mitigation.

On the information available, the proposals are unlikely to result in significant adverse landscape or visual effects. The authors of the Landscape and Visual Statement should be invited to recommend condition wording that directly secures the mitigation and assumptions relied upon in reaching their conclusions.

BACKGROUND

Introduction

The consultation relates to Crown development within an established developed context. The proposals include modular accommodation buildings and associated works.

For national security reasons, the location and detailed arrangement of the accommodation are classified. This limits the geographic information that can be reproduced in a public consultation response. The landscape judgement below is consequently expressed in principle and does not identify specific receptors or disclose locational relationships.

No previous landscape consultation response or relevant appeal decision has been made available as part of this review.

Relevant Policy and Guidance

The principal landscape considerations arise from national policy concerning the conservation and enhancement of the natural environment, together with relevant adopted local policies relating to landscape character, visual amenity, design and green infrastructure.

Relevant guidance includes:

- the Guidelines for Landscape and Visual Impact Assessment, Third Edition;
- the adopted Cherwell Local Plan and relevant saved policies;
- the Cherwell Landscape Character Assessment 2024; and
- the Oxfordshire Wildlife and Landscape Study.

The site lies within the published Otmoor Lowlands Landscape Character Area. The character assessment describes a generally flat and open lowland landscape, with areas of wet pasture, agricultural fields, hedgerows, drainage ditches, willow-lined watercourses and woodland. Vegetation can provide local enclosure, while raised routes and higher ground allow longer views across the lowlands. Existing military development is recognised as an established influence within parts of the character area.

The published forces for change include expanding urban influences, the effects of climate change and pressure for renewable energy infrastructure. The associated landscape strategy seeks to maintain open character and long views, protect rural character and tranquillity away from existing development, retain hedgerows and trees, and use planting to soften development edges.

Relevant Designations

The submitted material considers the relevant landscape and visual context, including publicly accessible routes and the relationship with surrounding landscape features. No public access is proposed through the accommodation site.

This response is not intended to provide an exhaustive check of environmental, heritage or landscape designations. The case officer should rely on the relevant technical consultees and application validation material for confirmation of all applicable constraints.

Documents and drawings reviewed

The following principal document has been reviewed:

- Landscape and Visual Statement, Final Issue, dated 21 May 2026.

The submitted plans and supporting information available for landscape consultation have also informed this response. References to plans, viewpoints and geographic relationships are intentionally excluded because the accommodation location is classified.

Site visit

The Landscape and Visual Statement records field survey of publicly accessible locations within the surrounding landscape. No separate site visit by the Council's Landscape Officer is recorded for the purpose of this response.

APPRAISAL OF LVIA/LVA

(with reference to GLVIA3 para 8.37)

Methodology and scope

The document is presented as a Landscape and Visual Statement rather than a full Landscape and Visual Impact Assessment. This is proportionate to the developed context of the site and the scale of the anticipated landscape and visual effects.

The assessment uses published landscape character information, desk-based visibility analysis and field observations from publicly accessible locations. This provides a reasonable basis for considering the principle of development.

The document does not present a formal matrix of receptor sensitivity, magnitude of change and significance for each landscape and visual receptor. Its conclusions are consequently qualitative. In the context of an established developed site with substantial existing vegetation and built form, this does not prevent an informed landscape judgement.

The conclusions rely on the proposed buildings remaining within the assessed height and development parameters, occupying the established developed envelope and retaining the principal vegetation that provides visual containment. These assumptions should be treated as part of the assessed scheme and secured where necessary.

Baseline Study

The Landscape and Visual Statement identifies the published key characteristics of the Otmoor Lowlands. These include the low-lying landform, mixed agricultural use, hedgerows, drainage features, watercourse vegetation, areas of woodland and the contrast between locally enclosed views and longer views from raised routes or higher ground. These characteristics are consistent with the district landscape character assessment.

The assessment relates the published character to the more immediate context by recognising the influence of existing military development, established buildings, infrastructure, woodland, hedgerows and mature trees. This supports the conclusion that the site does not share all the qualities of the more open and tranquil parts of the wider character area.

The published forces for change are not reproduced or evaluated in a dedicated section. The most relevant consideration is the potential for development to increase urbanising influence. In this instance, the proposals would reuse land within an existing developed envelope rather than introduce isolated development into undeveloped countryside. The proposals are therefore unlikely to result in a material change to the defining character of the wider lowlands.

The Landscape and Visual Statement identifies the principal vegetation contributing to the site's character and containment. Detailed arboricultural information and landscape proposals will still need to demonstrate that vegetation relied upon in the assessment can be retained and protected during construction and operation.

The Landscape and Visual Statement considers public rights of way and other publicly accessible receptors through desk study, theoretical visibility analysis and field survey. It identifies that views may be available from parts of the surrounding route network, while intervening vegetation and existing built form restrict or filter actual visibility.

Users of public rights of way are sensitive visual receptors. The degree of effect depends on the extent, duration and context of available views. The submitted assessment indicates that views of the proposals would generally be partial, filtered or seen in association with the existing developed site. The accommodation is not expected to become a defining or dominant component of views from the surrounding route network.

A route-by-route receptor schedule has not been provided. Such an assessment is not considered necessary to determine the principle of this proposal, provided the final design remains within the assessed parameters and retains the screening vegetation relied upon in the Landscape and Visual Statement.

On this basis, significant adverse effects on the visual amenity of users of public rights of way are not anticipated.

Proposals

The proposed buildings would be contained within an established developed site and would be experienced alongside existing buildings and infrastructure. Their assessed scale would not be disproportionate to the immediate built context.

Locating the accommodation within the established developed envelope represents appropriate inherent mitigation. It avoids direct encroachment into the surrounding undeveloped landscape and makes use of existing built form and vegetation to reduce prominence.

The detailed design should maintain the assumptions underpinning the assessment. Particular attention should be given to building heights, external colours and reflectivity, roofscape, rooftop equipment, lighting, fencing, gates and other security infrastructure. These elements should be considered together as part of the complete operational development.

Landscape and Visual Assessment

The overall conclusion that the proposals are unlikely to cause significant adverse landscape or visual effects is accepted.

At the landscape scale, the proposals would not result in a fundamental change to the landform, landscape pattern or defining characteristics of the wider character area. Existing development is already an established local influence, and the proposals would remain within that developed context.

At the visual scale, existing buildings and vegetation would limit the extent to which the accommodation would be perceived from the surrounding landscape. Where views may occur, the proposals would generally be seen as part of an established developed site rather than as isolated development within open countryside.

The mitigation identified in the Landscape and Visual Statement should be carried through into the final design. This should include the retention and protection of established vegetation, reinforcement of exposed development edges where appropriate, use of recessive low-reflectance materials, and integration of ancillary infrastructure.

New planting should respond to the existing landscape structure. It should soften and integrate the proposals without creating an artificial or incongruous screening belt. Species selection should be locally appropriate, climate resilient and coordinated with utilities, drainage, security requirements and statutory easements.

CONDITIONS/ CONCLUSIONS/ NEXT STEPS

No landscape objection in principle.

The Landscape and Visual Statement provides a proportionate basis for assessing the proposals. It identifies the relevant key landscape characteristics and considers public rights of way and other publicly accessible receptors. The forces for change are not expressly drawn out, though the key issue of urbanising influence is adequately addressed by the location of the development within an established developed envelope.

The proposals are unlikely to materially alter the defining characteristics of the wider landscape or result in significant adverse visual effects. This conclusion depends upon the development remaining within the assessed parameters and the retention, protection and reinforcement of the vegetation relied upon for landscape integration and visual containment.

The authors of the Landscape and Visual Statement should be invited to propose the final wording of a landscape planning condition. The wording should directly reflect the mitigation and assumptions relied upon in their assessment, remain proportionate to the predicted effects and avoid disclosure of classified location information.

Pending receipt of wording from the Landscape and Visual Statement authors, the following provides an appropriate basis:

Prior to development proceeding above slab level, a detailed landscape mitigation scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be prepared by a suitably qualified landscape professional and shall accord with the landscape and visual mitigation principles identified in the approved Landscape and Visual Statement.

The scheme shall include details of existing trees, hedgerows and other vegetation to be retained and protected; proposed soft landscape planting; measures to integrate development edges and associated infrastructure; an implementation programme; and arrangements for establishment maintenance, replacement planting and long-term landscape management.

The approved scheme shall be implemented in accordance with the approved details and programme. Any tree, hedge or shrub planted as part of the approved scheme that, within five years of planting, dies, is removed, becomes seriously damaged or becomes seriously diseased shall be replaced during the next available planting season with a plant of the same species and size as originally approved, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development is appropriately integrated into its landscape setting, that existing landscape features are retained and protected where practicable, and that suitable landscape mitigation is established and maintained.

The applicant is advised to ensure that the landscape scheme is prepared or reviewed by the authors of the Landscape and Visual Statement and reflects the mitigation relied upon in that assessment. Information submitted to the public planning register should not disclose the classified location of the development.

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16 September 2026

By email: crowncasework@communities.gov.uk

Application reference: PCU/RARE/C3105/3378843

Subject: Objection to planning application PCU/RARE/C3105/3378843, Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Bicester Town Council resolved at its meeting on Wednesday 16 September that it strongly opposes the Government's plan to house asylum seekers on Site A of MOD Bicester in the village of Piddington. The Acting Town Clerk was authorised to submit the following points of objection.

1. Disproportionate Scale

A smaller proposal for approximately 750 people on this land was refused by an independent Planning Inspector in 2003 and subsequently cancelled. The current proposal is significantly larger, seeking accommodation for up to 1,256 people.

Piddington is a very small rural community with approximately 315 residents. The proposed accommodation would represent an increase equivalent to almost four times the existing population, producing a resulting population of approximately 1,565 — meaning the existing community would be required to absorb a population almost five times its current size.

This is not a modest increase. It represents a fundamental change to the scale and character of the settlement and surrounding area, and it is essential that the proposal is judged on its proportionality and impact on the existing community and local infrastructure — not simply on whether the physical MOD buildings can contain the proposed number of people.

The National Audit Office has previously raised serious concerns about the Home Office's large-sites asylum accommodation programme. Its March 2024 findings concluded that the programme was expected to cost more overall than the hotels it was intended to replace, rather than delivering the savings originally projected.

2. Deficiencies in the Evidence Base

- The Home Office's own application documents acknowledge that parts of the evidence base remain incomplete. Its ecological consultant states that its survey cannot be considered a comprehensive assessment, while species surveys remain outstanding. The objection evidence also identifies missing biodiversity and fire-safety information.
- No borehole investigation has been undertaken to test the ground for contamination.
- A 2010 land quality assessment found areas investigated were generally unsuitable for redevelopment to a domestic end use without remediation, and identified potential contamination risks at Site A. The more recent assessment does not resolve the contamination question raised by that earlier work. Site A was used for military storage and logistics, not as a residential community, and questions also remain about asbestos in the existing buildings and the remediation this would require.
- The main accommodation is proposed on one of the lowest and most flood-prone parts of the site, and the evidence identifies significant surface-water flood risk with unresolved questions around drainage and attenuation.
- The Transport Assessment repeatedly refers to the B1104 rather than the B4011, which borders the site — evidence of shoddy desktop research. There is a history of injury collisions on the nearby B4011 and the lack of a continuous footway or lighting along much of the route.

- The application does not demonstrate a confirmed, reliable permanent electricity or wastewater solution. The Utilities and Infrastructure Assessment says the condition and capacity of the existing electricity network cannot presently be relied upon, while questions also remain over sewage capacity, the proposed wastewater arrangements, and the capacity of local communications and telecoms infrastructure to support the development.

The preliminary ecological assessment

The preliminary ecological assessment is flawed. It states that there are no records of bats, great, crested newts, dormice, badgers, reptiles, amphibians or rare plants within 2km of the site. However, a proper search of the correct records shows 12 bat species (several right next to the site), widespread evidence of great, crested newts including on the site itself, badgers just 300m away, otter, polecat and hazel dormouse close by, and 188 records of rare and protected wildflowers — including one so scarce it has its own county recovery plan. Great Crested newts are a protected species and a detailed survey must be carried out. Natural England have not closed out their advice on the neighbouring SSSI. There are concerns about the course of effluent and where it will end up.

3. Justification for Urgency and Consideration of Alternative Sites

The application is being progressed through the Urgent Crown Development process, which bypasses the normal planning route and materially shortens the opportunity for scrutiny. We have not seen a formal statement of national importance or a formal statement of urgency published alongside the application, and no evidence has been presented as to if alternative, less harmful sites were properly considered before Piddington was selected.

Given the significance of departing from the standard process, the relevant authorities should publish clear evidence explaining why this site was chosen, why the matter is genuinely urgent, and what alternative sites were assessed and on what basis they were rejected. Urgency should not be used as a substitute for evidence.

4. Inadequate Consultation Period

The Town Council has already made representations to increase the consultation period. The published representation period runs from 7 to 17 September 2026 — just 11 days, roughly half the 21-day minimum that applies to ordinary planning applications under the Town and Country Planning Act 1990, and that is prescribed at every stage of the standard Crown Development route.

Nearly two months passed between the application being submitted on 6 July 2026 and it being published for comment on 2 September 2026, and its supporting documents run to well over 1,000 pages across multiple technical disciplines. Eleven days does not give residents, councils or technical specialists a fair opportunity to examine an application of this scale and complexity.

5. Isolation of the Site and Lack of Local Facilities

Site A is several miles from central Bicester and is a rural, relatively isolated former military site. Piddington does not have the facilities that would ordinarily be expected to support a population of this size. There is no village shop, no public house, and no comparable local facility providing residents with everyday access to basic goods and services.

A substantial number of the proposed residents would inevitably need to travel outside Piddington for necessities, healthcare, shopping, recreation, legal support and other services. This raises significant questions regarding the availability and capacity of public transport, traffic generation, pedestrian safety, access to healthcare and legal advice, pressure upon neighbouring communities and their facilities, access to shops and essential services, the capacity of local public services, and the ability of the surrounding area to accommodate such a substantial additional population. The proposal should therefore not be assessed solely based on the site itself; its impact on neighbouring villages and the wider local area must also be properly considered.

6. Absence of Pavements and Pedestrian Infrastructure

Piddington is a rural settlement and does not have a comprehensive network of pavements capable of accommodating large numbers of pedestrians. If 1,250 additional residents are placed at the site, there will inevitably be substantially more pedestrian movement between the site, public transport, neighbouring settlements and local facilities — creating legitimate concerns about highway and pedestrian safety, particularly where people are required to walk alongside rural roads without pavements.

A detailed and independent assessment should therefore establish anticipated pedestrian movements, the routes likely to be used, the adequacy of existing footways, road crossing requirements, traffic speeds, visibility, accident risks, public transport access, and whether additional pedestrian infrastructure is required.

7. Inadequate Street Lighting

There is a further concern regarding street lighting, particularly where lighting is switched off overnight. The combination of a large additional population, rural roads, limited pedestrian infrastructure and inadequate overnight lighting creates a legitimate road and pedestrian safety concern. It would be unreasonable to expect significant numbers of people to walk through an unlit rural environment without first establishing that the routes are safe and suitable. The relevant authorities should provide evidence of a specific night-time pedestrian and highway safety assessment undertaken considering the proposed accommodation.

8. Pressure on Healthcare and Public Services

An additional population of approximately 1,250 people would inevitably create additional demand for local services. Questions must therefore be answered regarding the capacity of GP surgeries, dentists, pharmacies, hospitals, ambulance services, mental health and welfare services, interpreter and translation services, police, and fire and rescue services. It should not simply be assumed that existing services have sufficient capacity: the proposal should be accompanied by clear evidence that the relevant service providers have been consulted and that the additional demand has been assessed and appropriately resourced. Should the government provide these services on site then community cohesion will be severely affected considering that it is currently impossible to register with an NHS dentist for example in Bicester.

9. Emergency Services and Access

The rural nature of Piddington also raises concerns about emergency access. The authorities should demonstrate that the increased population can be adequately served by emergency services and that there are appropriate arrangements for emergency vehicle access, evacuation, fire safety, medical emergencies, policing, safeguarding and emergency communications. The potential increase in demand should be assessed against the existing capacity of the relevant services, rather than considered in isolation.

10. Safeguarding and Community Wellbeing

The proposal would accommodate a large population of single adult men at a rural site directly adjoining small, settled communities. This requires a clear, evidence-led safeguarding assessment covering both the wellbeing of the people accommodated and the safety of the surrounding community, including women, children and other vulnerable residents.

We have not seen evidence of what policing and reporting arrangements would be put in place, how walking routes, lighting and public transport safety have been assessed with this specific population in mind, or how any concerns raised by residents would be received and acted upon. The Government should set out these arrangements clearly before any decision is made, rather than leaving them to be resolved after the site becomes operational. The Police and Crime Commissioner for Thames Valley has already raised many of these concerns.

11. Impact on Neighbouring Communities

Because Piddington has very limited local facilities, many of the proposed residents will necessarily use facilities in neighbouring communities. The proposal could therefore place additional pressure on nearby shops, supermarkets, GP surgeries, dentists, pharmacies, bus services, railway stations, roads, public spaces and emergency services. The assessment should consider the cumulative impact across the wider area, rather than restricting consideration to the physical boundary of the MOD site.

12. Community Cohesion and the Character of Town and Village

The introduction of a population almost four times the size of the existing community cannot reasonably be regarded as having no effect on the character and functioning of the village. This does not mean the existing community is unwilling to welcome newcomers; rather, it recognises that successful integration and community cohesion require appropriate scale, facilities, transport, services and resources. A proposal of this magnitude requires a clear plan demonstrating how community cohesion will be supported and how both existing and new residents will be able to access appropriate services

and facilities. Whilst the impact on community cohesion will be most strongly felt in the village of Piddington, there is already evidence within Bicester that community cohesion is fraying.

13. Suitability of the Site

The fundamental question is whether this is an appropriate location for accommodation on this scale. The fact that the MOD site may contain buildings capable of being converted into accommodation does not demonstrate that the location is suitable for 1,250 residents. The assessment should consider the whole environment in which residents will live, including transport, healthcare, pedestrian infrastructure, lighting, shops, emergency services, recreation, access to support services and the impact on surrounding communities. A site that is physically capable of accommodating people is not necessarily one that is socially, environmentally or infrastructurally suitable for accommodating them at this scale.

14. Cost and Value for Money

No full cost for the proposal has been published. As residents and taxpayers, we ask that the Government publish the conversion, infrastructure, remediation, operating and long-term costs associated with Site A, together with how these compare with the alternatives being replaced. The National Audit Office has previously found that the Home Office's large-sites asylum accommodation programme was expected to cost more overall than the hotel provision it was intended to replace, rather than delivering the savings originally projected; this history makes published, site-specific costings for Site A even more important.

15. Accountability and Lines of Responsibility

A proposal of this scale involves multiple public bodies and contractors — including the Home Office, the Ministry of Defence, the site operator, local authorities, the police, the NHS and fire and rescue services — who may each hold different responsibilities. Before the proposal proceeds, the Government should make clear who assessed each significant risk, who is responsible for mitigating it, who will fund the necessary measures, who will monitor whether they work, and who is accountable if they fail. Public safety requires public accountability, and this should be set out clearly rather than assumed.

16. Request for Full Evidence and Assessments

Before any decision is made, we ask that the relevant authorities publish or make available the evidence and assessments underpinning the decision to identify Piddington as a suitable location. We request evidence addressing:

1. Highway and traffic impact, including a current Transport Assessment
2. Pedestrian and road safety
3. Night-time pedestrian safety
4. Public transport capacity
5. Healthcare capacity, including a health-impact assessment
6. Police and emergency service capacity
7. Fire safety and emergency evacuation
8. Safeguarding of residents and the surrounding community, including women, children and other vulnerable people, and the policing and reporting arrangements that would be in place
9. Waste and refuse management
10. Water, sewage, electricity and communications capacity, including a utilities-capacity report
11. Environmental impact and protected-species surveys
12. Site condition, including contamination, discarded munitions, and asbestos, and the remediation required
13. Community cohesion
14. Impact upon neighbouring settlements
15. The cumulative impact of the proposed population increase
16. An equality-impact assessment
17. A formal statement of national importance and a formal statement of urgency justifying the use of the Urgent Crown Development process
18. What alternative sites were considered and why they were rejected

19. The full cost of the proposal, including conversion, infrastructure, remediation, operating and long-term costs
20. Clear lines of accountability across all bodies involved in delivering and overseeing the proposal
21. Why a site accommodating approximately 1,250 people has been considered proportionate and appropriate for a community of approximately 315 existing residents and a small market town.

17. Conclusion

We respectfully request that the proposal is reconsidered, and that an alternative and more proportionate location is identified.

The issue is not whether migrants should receive appropriate accommodation. They should. The issue is whether it is reasonable or sustainable to place approximately 1,250 additional people in a small rural community of approximately 315 residents which has no shop, no public house, limited local facilities, inadequate pedestrian infrastructure and limited overnight street lighting and very poor links to the local town.

Such a substantial population increase requires substantially more than suitable buildings. It requires appropriate infrastructure, transport, healthcare, emergency provision, pedestrian safety measures, public services and a realistic strategy for supporting both the existing community and those being accommodated.

In the absence of compelling evidence demonstrating that these matters have been properly assessed and adequately addressed, we believe there are serious grounds to conclude that the proposed site is unsuitable for accommodation on the scale proposed. We therefore respectfully ask that this objection is formally recorded and fully considered before any decision is made.

Yours faithfully,

Paul Canning
The Acting Town Clerk
For and on behalf of Bicester Town Council

Piddington Parish Council

c/o Joe Marshall BSc(Hons)

Silver Teal Ltd

6 Greystones Court

Kidlington

OX5 1AR

4 September 2026

The Rt Hon Angela Rayner MP

Secretary of State for Housing, Communities and Local Government

Ministry of Housing, Communities and Local Government

2 Marsham Street

London SW1P 4DF

Re: Proposed Crown Development at Site A, MOD Bicester, Cherwell, Oxfordshire — Home Office urgent Crown Development application (received 2 September 2026)

Dear Secretary of State,

Piddington Parish Council writes further to its formal Objection to the above proposal (v3.0, 19 August 2026, twelve grounds), submitted in response to the Home Office's urgent Crown development application under sections 293B–293C of the Town and Country Planning Act 1990 and the Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025 (SI 2025/411). This letter sets out matters of particular concern that we ask you, as the determining Secretary of State, to address directly and in writing before any decision is issued.

1. The statutory urgency threshold has not, in our assessment, been met

Section 293B(1)(b)(ii) of the 1990 Act permits this accelerated route only where it is necessary that the development be carried out as a matter of urgency, and published guidance requires the applicant to demonstrate that the development must be made operational to an accelerated timeframe that is not feasible by other application routes. On the evidence submitted, the Parish Council does not consider that test has been satisfactorily made out. We reserve the right to argue, in any future challenge, that the urgent route has been invoked without a lawful evidential basis, and that the application should instead have proceeded, if at all, under the non-urgent Crown development route (sections 293D–293J), with the fuller consultation and scrutiny that route provides.

2. Substantive planning objection: the scheme has not been shown to be feasible

Independently of the procedural point above, the Parish Council maintains that permission should be refused on ordinary planning policy grounds. In summary, and as set out at length in our Objection:

- Flood risk: the Parish Council holds photographic evidence, taken at the proposed site, showing standing and flood water present on the land on multiple occasions, and the applicant's own submitted documents corroborate this in terms we consider startling. This is set out in full at section 2A below.
- Highways and road safety: the surrounding road network has not, in our assessment, been demonstrated capable of safely accommodating the scale of movement associated with a facility of this size.
- Ecology and landscape: the application does not, in our view, adequately evidence mitigation for the ecological and landscape impacts of a development of this scale on this land.
- Infrastructure capacity: no adequate case has been made that local infrastructure, including utilities, can accommodate the development.

2A. The applicant's own evidence on flood risk

We do not rest the flood risk ground on our photographic evidence alone. The applicant's own submitted Drainage Design Statement records that the Phase 1 accommodation, 408 bedspaces, including 24 medical isolation units, is sited on “the lowest part of the site”, that there is “no suitable area for attenuation storage within Phase 1”, and that flows from this area “cannot be restricted to greenfield rates”. Following a site inspection on 25 February 2026, the same document records that the existing drainage network “have not been subject to routine maintenance for a considerable period and are therefore considered to be non-operational”, that the MOD site team confirmed the area “is prone to frequent surface water flooding”, attributed to two failed pumps and blocked drains and gullies, and that “evidence of localised surface water flooding and ponding was observed in several areas”, on a clear, dry day. The applicant's own Planning Proposal Statement separately records that approximately 25 per cent of the site has a high chance of surface water flooding.

Despite this, the Flood Risk Assessment concludes that an exception test is not required, on the basis that the site is almost entirely in Flood Zone 1, without classifying the vulnerability of the use proposed. A residential institution of this kind is “More Vulnerable” under Annex 3 to the National Planning Policy Framework, and approximately 0.16 hectares of the site lies within Flood Zone 3. Downstream routing “remains undetermined”, outfalls are assumed, no CCTV survey of the network has been carried out, infiltration has been ruled out on desk-study grounds without BRE 365 testing, and downstream effects at Arncott Bridge and the wider River Ray floodplain have not been modelled; hydraulic modelling is recorded as something that “will be required”. No flood evacuation or emergency response plan has been produced, and neither the Environment Agency nor the emergency services has yet been consulted on this point.

We raise this in such detail because of what we believe it would mean, in practice, to grant permission for this scheme in its current form. This is not a case of a local objector alleging a risk the applicant disputes; it is a case where

the applicant's own drainage engineers have already recorded, in writing and following a site inspection, that the ground proposed for Phase 1 is the lowest point on the site, that its drainage is non-operational, and that flooding was observed there on a dry day. If Phase 1 floods after people are living on it, in a facility with no documented evacuation plan, we do not believe that decision would be defensible, either as a matter of public accountability or, more importantly, for the safety of those it was meant to protect. We put this to you directly so that it can be weighed before a decision is made, not afterwards.

3. Specific statutory compliance concerns: utilities, hazardous waste and contamination

We ask you to confirm, before any decision is issued, that the following have been properly assessed to the standard the relevant statutory regimes require, and to publish that assessment:

- Foul and surface water treatment capacity, and compliance with the Water Industry Act 1991 (including section 106 connection requirements) and the relevant sewerage undertaker's capacity assessment;
- Hazardous waste arising from the proposed use, and compliance with the Environmental Permitting (England and Wales) Regulations 2016; and
- Potential land contamination arising from the site's former and current uses, and compliance with the Part IIA contaminated land regime under the Environmental Protection Act 1990.

We are not satisfied, on the application as submitted, that these matters have been adequately addressed, and we consider that granting permission without proper assessment of them would risk harm both to the local environment and to the health and safety of those the scheme is intended to accommodate.

4. Requested condition: no works before feasibility is proven

It is our assessment that the applicant intends to proceed with construction regardless of whether these feasibility matters have been resolved. We therefore ask that, should permission nonetheless be granted, it be made subject to a condition preventing the commencement of any construction works until a satisfactory flood risk assessment and drainage strategy, confirmation of utilities capacity, and a full contamination survey have been submitted to and approved in writing by the Secretary of State. We consider such a condition necessary to protect the local environment and ecology, and the wellbeing of the site's prospective residents, from harm that cannot otherwise be undone.

5. Formal notice

Piddington Parish Council puts you on formal notice that, if planning permission is granted for this development (i) without the statutory urgency threshold in section 293B having properly been met, or (ii) without lawful regard to the matters set out above, to the development plan, to material considerations under section 38(6) of the Planning and Compulsory Purchase Act 2004, or to the Public Sector Equality Duty under section 149 of the Equality Act 2010, the Parish Council intends to pursue a statutory application under section 288 of the Town and Country Planning Act 1990, and reserves the right to seek judicial review of the process leading to that decision, without further notice. All rights, including as to costs, are expressly reserved.

We ask that this letter be treated as a formal representation for the purposes of the consultation on this application, alongside our Objection and its supporting appendices, copies of which we can resupply if required.

6. Risk to life, and the personal accountability of decision-makers

We raise a further concern which, in our view, underlies each of the matters set out above. Taken together, the unresolved flood risk, the unaddressed utilities and drainage capacity, and the unassessed hazardous waste and contamination issues on this site are not, in our assessment, planning deficiencies alone. They represent a material risk to life that we do not believe has been adequately considered, and one that is not confined to a single group or a single location, but could affect residents, staff and members of the surrounding community, in more than one way, should any of these risks materialise on a site of this scale.

We raise this in the same spirit as the accountability that has, since Hillsborough and the inquiries that followed it, come to be expected of those in positions of public authority: that a foreseeable and clearly identified risk to life, left unaddressed, cannot later be treated as an unforeseeable tragedy, and that responsibility for that outcome would in due course be expected to rest with those who had the opportunity to act on the risk and did not. We raise it not as a threat, but as a genuine and considered request that this risk be properly and visibly assessed before any decision is made, rather than after the fact.

I should be grateful for your acknowledgement of this letter, and for a substantive response in due course.

Yours sincerely,

[redacted]

Joe Marshall BSc(Hons)

On behalf of Piddington Parish Council



PIDDINGTON PARISH COUNCIL

Formal Written Representation

In response to Urgent Crown Development application: MOD Bicester (Site A) to PCU/RARE/C3105/3378843

Objection to Proposed Urgent Crown Development at Site A, MOD Bicester

Revised following publication of the application documents

Application by the Secretary of State for the Home Department under sections 293B–293C of the Town and Country Planning Act 1990

Version 4.0

16th September 2026

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Document Control

Document	Objection to Proposed Urgent Crown Development at Site A, MOD Bicester, Oxfordshire
Prepared by	Piddington Parish Council ("PPC")
Addressed to	The Secretary of State for Housing, Communities and Local Government (Planning Casework Unit, Crown Casework Team); copied to Cherwell District Council as relevant local planning authority, Oxfordshire County Council as local highway authority, and the Planning Inspectorate
Statutory basis	Representation in relation to an application made under section 293B of the Town and Country Planning Act 1990, governed procedurally by the Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025, SI 2025/411
Version	4.0 - revised following publication of the application documents. Supersedes Version 3.0 (19 August 2026), Version 2.0 and the draft of 27 July 2026 in their entirety. Version 2.0 was a comprehensive revision and verification of the 27 July draft; Version 3.0 incorporated WPWS amendments and consolidated additional research; this Version 4.0 revises the representation throughout against the Applicant's own submitted material.
Date	16th September 2026
Verification	Every statutory provision, policy reference, authority and technical assertion in this representation has been checked against primary sources. Every statement made in this Version 4.0 about the content of a document submitted by the Applicant has been checked against that document as published. Where a document, or part of a document, could not be read as published, that fact is stated expressly and no conclusion is drawn from the unreadable material.

Note on approach. This representation is prepared to the evidential standard expected of professional planning and legal representations. It advances no political argument about national asylum policy, which is a matter for Parliament and not for the planning system. It advances no argument founded on assumptions about the character or conduct of those who would be accommodated at the Site; PPC expressly disavows any such argument. Its case is confined to matters that are properly material to a planning judgement: the lawfulness and appropriateness of the procedural route selected, the conformity of the proposal with the statutory development plan and national policy, the adequacy of the evidence base, the capacity of receiving infrastructure, the environmental and highway consequences of the development, and the welfare of both the existing community and the future occupants of the Site.

Executive Summary

The proposal

ES.1 On 25 June 2026, in a statement to the House of Commons, the Minister of State for Border Security and Asylum confirmed that three further former Ministry of Defence sites, MoD Barnham (Suffolk), MoD Bicester (Oxfordshire) and MoD Linton-on-Ouse (North Yorkshire), were under consideration for use as asylum accommodation, together capable of accommodating in the order of 3,750 people, "subject to feasibility assessments, planning permission and the necessary approvals."

ES.2 The Home Office published a site factsheet for MoD Bicester (Site A) on 30 June 2026. That factsheet records that the site is no longer in active use by the Ministry of Defence; that if taken forward it would provide basic accommodation designed to be "largely self-sufficient"; that occupancy would be phased; that the site **would be used for a minimum of ten years**; that it would accommodate single adult males aged 18 to 65; that an experienced specialist provider would be appointed to operate it; and critically that **the site remains subject to "detailed feasibility assessments, which could take several months to complete"**, which are described as routine exploratory work that does **not** predetermine the site's future use.

ES.3 Notwithstanding that published position, the Home Office has submitted an application for planning permission understood to be under the **Urgent** Crown Development procedure in sections 293B and 293C of the Town and Country Planning Act 1990 ("the 1990 Act"), as inserted by section 109 of the Levelling-up and Regeneration Act 2023, and governed by SI 2025/411. The Home Office's stated basis for using that route is the national importance of "responding to sustained pressure on the asylum accommodation estate" and reducing reliance on hotels and other contingency accommodation.

ES.4 Cherwell District Council, as the relevant local planning authority, has publicly recorded that **no engagement or consultation of any kind took place with the district in advance of the announcement**.

PPC's position

ES.5 Piddington Parish Council objects to the proposal. Its objection is to the principle of the development at this location, and it does not proceed on the basis that the harms identified are capable of resolution by condition or by a planning obligation under section 299A of the 1990 Act.

ES.6 PPC's case rests on twelve grounds, grouped under three headings.

PART B - PROCEDURAL AND JURISDICTIONAL GROUNDS

- **Ground 1 - National importance is not established at the level of this site.**

  PPC accepts that the national asylum accommodation system, viewed in aggregate, engages significant public interest. It does not accept that a generalised, system-level interest can be transposed onto a single-site planning decision to displace site-specific planning judgement. The Applicant's Statement under article 6(1)(c)(iv) of SI 2025/411 must be tested against the criteria in the Written Ministerial Statement of 13 February 2025 (HCWS454) and Planning Practice Guidance Paragraph 043 (Reference ID 44-043-20250512).

- **Ground 2 - Urgency is not made out, and is contradicted by the Applicant's own published material.**

  The guidance test (PPG Paragraph 027, Reference ID 44-027-20250512) requires the applicant to demonstrate that the development must be made operational to an accelerated timeframe *that is unlikely to be feasible using other application routes, including the standard Crown Development route*, together with evidence of the consequences of not securing a decision within that timeframe. Three matters, each drawn from the Government's own published material, tell decisively against that test being satisfied: (i) the Home Office's own factsheet, published five days after the announcement, states that feasibility assessments "could take several months" and do not predetermine use; (ii) the stated intention is a **minimum ten-year** operational life, which is a long-term estate commitment rather than a time-critical emergency response; and (iii) the Government's own reported statistics show hotel use **more than halved** from its peak, with around 170 hotels remaining against a peak of roughly 400, and the hotel population reduced from approximately 56,000 in 2023 to approximately 21,000 as at March 2026 a 35 per cent year-on-year reduction. A pressure that is, on the Government's own account, reducing substantially, cannot without further and specific evidence sustain a certification of genuine urgency.

- **Ground 3 - Procedural fairness, publicity and the EIA gateway.**

  There is no statutory minimum representation period for a non-EIA urgent Crown development application. Article 10 of SI 2025/411 is permissive: the Secretary of State *may* publish an address and period for representations. The mandatory 21-day and 30-day periods apply to the *standard* Crown Development route under SI 2025/409, not to the urgent route. Under SI 2025/411 the only guaranteed minimum periods, a 30-day site-notice period, a 30-day period before determination, and 30-day consultation of the wider Schedule 4 statutory consultees arise **only if the application is an EIA application** (articles 11, 14 and 17). It follows that the EIA screening decision is not merely an environmental question: **it is the gateway to the only procedural protections the community and statutory consultees are guaranteed.** PPC's primary procedural submission is therefore that the proposal must be screened as EIA development, and that in any event the Secretary of State should (a) publish a representation period of not less than 30 days under article 10, (b) consult the full Schedule 4 list, (c) appoint an independent technical advisor as expressly contemplated by PPG Paragraph 062 (Reference ID 44-062-20250512), and (d) exercise the power recognised at PPG Paragraph 057 (Reference ID 44-057-20250512) to require further information where the material submitted is insufficient for an informed planning judgement.

PART C - PLANNING MERITS

- **Ground 4 - Development plan conflict and locational unsustainability.**

  Section 38(6) of the Planning and Compulsory Purchase Act 2004 applies with full force. The proposal conflicts with the adopted Cherwell Local Plan 2011–2031 (Part 1) - in particular Policies PSD1, SLE 4, ESD 6, ESD 7, ESD 8, ESD 10, ESD 13, ESD 15, ESD 17, INF 1 and Villages 1 and with saved Policy C15 of the Cherwell Local Plan 1996. The Site lies wholly outside the adopted settlement hierarchy.

- **Ground 5 - Highway safety and access.**

  The B4011 / Widnell Lane / Palmer Avenue corridor is unlit, without continuous footway provision, and subject to the national speed limit outside village envelopes, though PPC notes that the stretch of the B4011 nearest the Site is in fact signed at 50 mph. This is not a new or speculative concern: **an independent Planning Inspector, reporting on a materially similar proposal at this same landholding in April 2003, identified the risk of road accidents involving pedestrian asylum seekers and others as a real, practical worry to which the Home Office had given insufficient attention.**

  The Applicant's own EIA Screening Direction: Written Statement goes further, acknowledging the same risk and proposing high-visibility vests and reliance on a shuttle bus as its response; PPC submits that this addresses the symptom rather than the hazard, and develops the point at Section 8. PPC also raises the safety of the routes used by residents on foot to the nearest facilities, including Palmer Avenue towards Upper Arncott, and the protection of the rights of way, footpaths and bridleways around the Site used by the existing community.

- **Ground 6 - Infrastructure capacity, and in particular wastewater.**

  The Bicester wastewater catchment is under recognised strain. The 2022 growth upgrade at Bicester Sewage Treatment Works was designed to serve a population equivalent rising to 67,840 **at a 2026 design horizon**, that is, the current year. Independent analysis indicates that a majority of Thames Water's treatment works are operating without sufficient capacity. Materially, the delivery of further AMP8 growth investment is now itself uncertain: on 16 June 2026 the Secretary of State for Environment, Food and Rural Affairs told Parliament that she did not consider the creditor-led recapitalisation proposal for Thames Water went far enough, and her letter to Ofwat warned that the proposal could defer a significant number of investments, in some cases for as long as a decade, expressly identifying potential delays to wastewater treatment projects. Infrastructure that cannot be shown to be deliverable cannot be relied upon as mitigation. The Landscape and Visual Statement itself records that utilities, site services, and foul and surface water drainage systems will need to be replaced or have their capacity increased to serve up to 1,250 service users; PPC submits that the scale and cost of that reinforcement is directly relevant to deliverability and to value for money (see Section 15). Separately, PPC understands that the clean water network serving the Site is limited and may be a private supply requiring external reinforcement, and requests confirmation of the capacity available and of the impact on existing users and on planned local housing development (see Section 9.3).

- **Ground 7 - Ecology, protected species and biodiversity net gain.**

  The applicants preliminary Ecological Appraisal has been undertaken on incorrect base data drawn from Buckinghamshire records rather than from the Thames Valley Environmental Records Centre (TVERC), the biological records centre for Oxfordshire, in which the Site lies. A TVERC data search for the Site (ref TVERC/26/0448) returns 5,984 protected and notable species records across 170 taxa within 2 km, 765 bat records across 19 taxa within 5 km, 14 non-statutory designated wildlife sites within 2 km, and 8 Section 41 habitats of principal importance covering 87.1 hectares, none of which appears to have informed the assessment. The Site lies within a landscape of recognised ecological value including the Arncott Bridge Meadows SSSI, the Wendlebury Meads SSSI and the wider River Ray / Otmoor / Bernwood landscape identified in Cherwell's own Green and Blue Infrastructure Strategy. A ten-year minimum operational life places the development outside the new five-year temporary-development exemption from mandatory biodiversity net gain taking effect on 6 August 2026, so the full 10 per cent obligation under Schedule 7A to the 1990 Act applies. Noise, light and vibration, both during construction and from continuous 24-hour occupation and lighting, are capable of disturbing foraging and roosting bats and other protected species in and around the Site, including through the generator provision that appears to be relied upon for power (see Section 15A.2); PPC understands from local residents that bats are regularly seen foraging over the Site itself, in addition to the confirmed populations recorded nearby at Graven Hill. The Site also lies close to numerous other wildlife assets, including the Jubilee Nature Reserve some 250 metres to the south and ancient woodland, including Piddington Wood, within a kilometre, all of which are capable of being affected notwithstanding the absence of public access to the Site, since the future occupants will not be confined to it. PPC also asks what use will be made of on-site renewable generation, including for the vehicle fleet used to move residents to and from the Site, to reduce both grid demand and vehicle emissions. See Section 10.

- **Ground 8 - Land quality and contamination.**

  The most recent land quality assessment PPC has been able to identify was prepared on the express basis of a commercial or industrial end use. Residential-equivalent occupation engages materially different and more exacting exposure assumptions.

- **Ground 9 - Landscape, character, heritage and dark skies.** The Landscape and Visual Statement describes the proposal as an opportunity to replace buildings in a poor state of repair with modern modular structures within the existing built envelope. The Site is presently in storage and warehousing use; replacing that with residential-equivalent modular buildings on this scale would change the character of the area, in a rural setting where new housing in the surrounding villages is overwhelmingly traditional and built in the local Cotswold stone, with no development of this modern type in the four nearest villages and the closest comparator, at Graven Hill, some five kilometres away. PPC also relies on Policy ESD 13, which restricts development that would impact on areas of high tranquillity, a description this area merits, and on saved Policy C28, which requires new development to be sympathetic in materials and appearance to its urban or rural context; PPC submits that a rural site presently used for storage cannot readily be made sympathetic to that context by the proposed built form, particularly given its prominent roadside location. See Section 12.

- **Ground 10 - Flood risk, drainage and climate resilience.**

  The Drainage Design Statement states that post-development runoff rates are anticipated to be lower than existing conditions. PPC does not accept that without further evidence: the proposal introduces substantial additional built form and hardstanding without a corresponding increase in soft landscaping, any increased runoff would discharge toward the Arncott SSSI and the tributaries of the River Ray, and the surrounding area, which lies within the Upper Thames Clay Vales and is partly designated as functional floodplain, already experiences recurrent winter flooding. See Section 13.

  As indicated within the application itself, it has been noted that standing water and surface water flooding are often observed on the applicant site. Insufficient evidence has been identified to mitigate the risk of surface water flooding impacting the operations of the site.

- **Ground 11 - Public health, safeguarding and social impact.**

  In *TG and others v Secretary of State for the Home Department* [2025] EWHC 596 (Admin), Mould J held that the Home Secretary had acted unlawfully in relation to three of four lead claimants accommodated at RAF Wethersfield, and importantly for present purposes found a systemic breach of the public sector equality duty in section 149 of the Equality Act 2010 arising from the failure to assess the equalities implications of a change to the allocation policy, describing that failure in the strongest terms.

  The application itself has indicated that the placement of waste management services, including cesspools will be located within insufficient distances from accommodation buildings, indicating potential risks of contamination but also poor odour control.

- **Ground 12 - Need, alternatives, deliverability and value for money.**

  The Home Office's record on comparable large sites is a matter of published National Audit Office and Committee of Public Accounts findings. Set-up costs at the two former RAF bases rose from an estimated £5 million each to approximately £49 million (Wethersfield) and £27 million (Scampton). Scampton was cancelled in September 2024 as not value for money. The Northeye estate at Bexhill, purchased for £15.4 million in September 2023, was deemed unsuitable. Linton-on-Ouse was abandoned in 2022. Cameron Barracks was ruled out in June 2026 "following detailed assessments". And at this very location, the 2001–2005 Bicester Accommodation Centre programme was cancelled in June 2005 after approximately £28 million of public expenditure.

  This application is noted to have reference to electricity generators, waste process and treatment plant, as well as deliveries of basic utilities. In addition, there is a higher element of new build construction, which means we would forecast the anticipated project value to be substantially higher.

PART D - THE APPLICATION AS SUBMITTED

DS.7A The application was submitted on 6 July 2026. It seeks planning permission for the temporary change of use of the Site for the phased provision of non-detained asylum accommodation **for up to 1,256 service users**, in three phases of 408, 216 and 632 bedspaces, supported by approximately 130 staff, on a site area stated as 10.22 hectares, for a proposed period of ten years. On 20 July 2026 the Secretary of State notified Cherwell District Council that the proposal had been "deemed Nationally Important and Urgent". On **26 August 2026** the Secretary of State directed that the proposal is **not EIA development**. The validity of this is disputed.

DS.7B PPC has analysed the submitted documents in full. That analysis is set out in a companion report, *Analysis of the Submitted Application: Information Adequacy, Validation Shortfalls and Correlation with the Council's Grounds of Objection* (Version 1.0, 2 September 2026), which is submitted with this representation and forms part of it. Its findings are carried into the body of this Version 4.0 at the closing subsection of each ground.

DS.7C No ground of objection falls. Seven grounds are materially strengthened by the Applicant's own documents. Four are narrowed in identified particulars, each of which is recorded expressly at 1.4.4 and in the closing subsection of the ground concerned. Ground 3 has become the pivotal ground, because the screening direction of 26 August 2026 has closed the only statutory gateway to a guaranteed representation period, guaranteed site notices and consultation of the wider Schedule 4 statutory consultees. Four new grounds are added at Section 15A.

DS.7D Three findings are placed at the front of the analysis and are repeated here.

- **The Applicant's own consultants state that the foul drainage solution has not been determined and that its viability is unknown.** The Drainage Design Statement of June 2026 records that "no definitive information is available regarding the capacity of the nearest WwTW or its ability to accept the projected flows from the proposed development", that "It has not been possible to liaise with the statutory undertaker within the RIBA 2 design programme", and that "the viability of the current design proposals has not been determined at this stage". Because capacity to treat cannot be established, the Applicant has designed instead for a **new wastewater treatment works constructed on the Site, discharging to a watercourse that has not been identified, under an environmental permit that has not been applied for**, with a cesspool and tankering in the interim which the same consultant concedes "is not a viable option for the total number of SUs ultimately anticipated". In later phases "the residential and welfare units are intended to be approximately 45 m from the WwTW", against a standard odour boundary the report gives as "~250m from the source of odour", and no odour impact assessment has been carried out.

- **Natural England's advice rests on two premises the Applicant's own June 2026 drainage report had already abandoned.** On 23 July 2026 Natural England advised that "hydrological connection between the site and the SSSI cannot be ruled out"; noted "that the project will be designed to ensure greenfield runoff rates which are lower than existing runoff rates"; noted "that it is anticipated that foul water will be connected to mains and should this not be the case Natural England would also need to be consulted on the alternative means"; and concluded "Please re-consult Natural England once this information has been obtained." Foul water is not proposed to connect to mains, and greenfield runoff rates are expressly not achieved in Phase 1. No re-consultation is evidenced. The receptor is the Arncott Bridge Meadows SSSI and the Secretary of State is subject to the duty in section 28G of the Wildlife and Countryside Act 1981.
- **The Planning Proposal Statement states, at its paragraph 5.1, that "There is no statutory requirement for the decision maker to consider compliance with the development plan."** That is contrary to Planning Practice Guidance Paragraph 051 (Reference ID 44-051-20250512), which states that "an application under the Crown Development route will be determined in accordance with the development plan unless material considerations indicate otherwise". The consequence is substantive: ten engaged adopted policies are recited in Section 5 of that document and never applied.

DS.7E The order in which the evidence was produced. PPC advances, as a new and freestanding matter at Section 5A, an analysis of the dates borne by the submitted documents. In summary: the Article 4 notice was served on 16 June 2026, nine days before the Minister told the House of Commons that the site was "under consideration"; the application form was signed on **25 June 2026, the very day of that announcement**; the Home Office factsheet of 30 June 2026, five days later, stated that feasibility assessments "could take several months to complete" and "do not predetermine its future use"; the national importance and urgency determination was communicated to the local Member of Parliament on 13 July 2026, seven days after submission and seven days before the local planning authority was told; and the EIA screening direction did not follow until 26 August 2026, a further forty-four days later. All of the principal site survey work was carried out in a ten-week window between 25 February and 16 April 2026, and the ecological survey fell outside its own recommended season. PPC's submission is not one of bad faith. It is that the assessments followed the decision in principle rather than informing it.

The single most important point

DS.8 In 2002–2003 the Home Office promoted an accommodation centre for 750 persons at the Defence Storage and Distribution Centre, Bicester. A public local inquiry sat for fourteen days between 10 December 2002 and 3 March 2003. The Inspector reported on 18 April 2003 recommending that approval should not be given. His overall conclusion, at paragraph 14.75 of his report, rested on three reasons: that the need to create a more sustainable pattern of development lies at the heart of the Government's approach to land use planning and that it would be inappropriate for Government to make an exception for its own development; that the necessity for and benefits of a rural location had not been shown to be convincing or overriding, the proposal appearing to be driven by the availability of surplus Government-owned land and an undemonstrated belief that a rural location would aid self-containment; and that the risk of road accidents involving pedestrian asylum seekers and others was a real, practical worry given insufficient attention by the Home Office.

DS.9 The First Secretary of State disagreed and granted approval on 18 August 2003, on the footing that there was an urgent need for a trial of accommodation centres. Cherwell District Council's challenge to that decision was dismissed: *R (Cherwell District Council) v First Secretary of State* [2004] EWHC 724 (Admin) (Collins J). **The centre was never built. The programme was cancelled in June 2005, some £28 million of public money having been spent, the National Audit Office subsequently recording that sustained local opposition had elongated the planning process, delayed the start on site by fourteen months and contributed to the scheme becoming uneconomic.**

DS.10 PPC invites the Secretary of State to weigh that history with care. The assertion of urgent national need at this precise location has been made before, was accepted before, and did not result in delivery. The Inspector's contemporaneous analysis of *why* the location was unsuitable, sustainability, the absence of a demonstrated case for a rural location, and pedestrian road safety, has not been overtaken by events. It has, if anything, been reinforced by the intervening tightening of national policy on sustainable transport, settlement patterns and biodiversity. It is also PPC's understanding, subject to confirmation from the Applicant's own traffic data, that traffic volumes on this corridor have increased materially since the 2002-2003 application; any such increase would only exacerbate the risk identified then, combined with the higher occupancy of this new proposal and the additional traffic the development would itself generate.

Relief sought

DS.11 PPC's principal submissions are, in order:

- That the Secretary of State should not accept, on the material presently available, that the statutory tests in sections 293B and 293C of the 1990 Act are satisfied, and in particular should not accept that the urgency limb is made out.
- That, if national importance is accepted, the proposal should be redirected to the **standard** Crown Development route under sections 293D to 293J and SI 2025/409, so that it is determined in the first instance by an independent Inspector following a hearing or inquiry, with the statutory publicity, consultation and representation periods that route guarantees.
- That the proposal be screened as EIA development, so that the mandatory publicity, consultation and 30-day periods in articles 11, 14 and 17 of SI 2025/411 are engaged.
- That the Secretary of State exercise the power at PPG Paragraph 057 to require the further information identified in this representation before determination, and appoint an independent technical advisor under PPG Paragraph 062.
- That, on the planning merits, the application be refused.

PART A - INTRODUCTION AND CONTEXT

1. Introduction, Status and Scope of This Representation

1.1 Who this representation is from

1.1.1 This representation is submitted by Piddington Parish Council, the statutory parish council for the civil parish of Piddington in the district of Cherwell, Oxfordshire. Piddington is the settlement lying closest to Site A to the south-east.

1.1.2 PPC has prepared this representation with specialist planning, legal, ecological, highways and infrastructure input, and has engaged with Cherwell District Council as local planning authority, with Oxfordshire County Council as local highway authority and lead local flood authority, with neighbouring parish councils, and with the Member of Parliament for Bicester and Woodstock. PPC does not purport to speak for any of those bodies, each of which will make its own representations; references in this document to their published positions are made only where those positions are a matter of public record.

1.1.3 PPC records that the proposal has generated substantial community concern. This representation gives that concern formal and evidenced expression. It is not a substitute for it, and it does not seek to characterise or aggregate it.

1.2 The purpose and limits of this document

1.2.1 PPC's purpose is to place before the decision-maker, at the earliest possible point, a comprehensive and evidenced statement of objection grounded in the statutory and policy framework applicable to the application.

1.2.2 That purpose is given particular urgency by a feature of the chosen procedure which is analysed in detail at Section 6 below and which PPC believes has been widely misunderstood. **The urgent Crown Development procedure contains no guaranteed minimum representation period for non-EIA development.** Article 10(1) of SI 2025/411 provides only that the Secretary of State *may* publish an address for representations and a period within which they must be made. Where such a period is published, the Secretary of State must not determine the application before it ends, must take into account representations received within it, and may disregard those received afterwards (article 10(3)). Where no period is published, the Order imposes no corresponding constraint. Article 15 requires the Secretary of State to notify the relevant local planning authority of a period for representations, but specifies no minimum length, and article 15(3) permits determination before that period expires once a substantive response has been received. Under article 13(3), the same is true of the statutory consultees.

1.2.3 PPC therefore proceeds on the assumption that it may have a single opportunity to place its case before the decision-maker, and has prepared this representation accordingly. It is submitted now, in advance of and without prejudice to any representation period that may subsequently be published, and PPC requests that it be treated as its formal representation for all purposes once any such period opens, without need for re-submission. PPC further requests written confirmation of receipt and of the intended procedural timetable.

1.2.4 This representation does not purport to be the final word on every technical matter it raises. It is prepared in the absence of the Applicant's Statement of National Importance and Urgency, its statement of planning acceptability under article 6(1)(c)(v) of SI 2025/411, any Environmental Statement, Transport Assessment, Flood Risk Assessment, ecological survey, land quality assessment, Landscape and Visual Impact Assessment, drainage strategy, utilities capacity statement or Equality Impact Assessment. Where the Applicant's own evidence, once published, is more site-specific or more recent than the material relied upon here, PPC will review it and will supplement or narrow its objection accordingly.

1.2.5 What will not change is PPC's position that this Site, brought forward in this way and on this timescale, is the wrong location for a development of this nature and scale.

1.2.6 (e) Four limits on this analysis are recorded so that the decision-maker may weigh it accordingly.

- **Unreadable material.** Substantial parts of the Preliminary Geo-environmental and Geotechnical Assessment (including its recommendations and the conceptual site model at its Appendix E), of the Flood Risk Assessment (including its fluvial and surface water risk analysis at sections 4.1 to 4.3), and of the Preliminary Ecological Appraisal (including its species-by-species results and its target notes at Appendix B) are not readable as text in the versions published. The four application drawings carry no readable schedule of areas, heights, unit numbers or parking. PPC draws no adverse inference from what it cannot read. It records that the inability of the public and of consultees to read the substantive analysis in these documents is itself a matter for the Secretary of State under article 9 of SI 2025/411.
- **Redaction.** Several documents are published in redacted form. The three options considered for the outfall of the proposed on-site wastewater treatment works are redacted in their entirety. Passages describing the existing foul drainage findings and the electrical and telecommunications findings are redacted mid-sentence. Author, checker and approver names are absent from every technical report. PPC repeats its request at paragraph 4.2.1 for confirmation whether any direction under section 293B(11) has been sought or made.
- **Blank paragraphs.** The Planning Proposal Statement as published contains at least twenty numbered paragraphs which carry a heading but no text, including those dealing with admissions, access for new arrivals, service users leaving and returning to the Site, suicide and self-harm prevention, health and safety, handling a death at the Site, and security; and a number of sentences from which the operative figure is absent, including those stating the parking provision, the cycle parking standard and the percentage traffic increase on the B4011. Its table of contents contains the entry "Context and Background ..... Error! Bookmark not defined." The document is marked Revision D, "Final for submission".
- **Two documents were not submitted with the application.** The covering letter of 6 July 2026 states that the Noise Technical Note and the Air Quality Technical Note "are being finalised and will be submitted under separate cover". Documents bearing those descriptions have since been published; PPC has reviewed them and refers to them, but records that they did not form part of the application as submitted, that they post-date the Applicant's EIA screening request of 3 July 2026, and that the Planning Proposal Statement nonetheless reaches conclusions on noise and air quality at its paragraphs 7.13 to 7.20.

1.3 The parish consultation of 7 to 14 September 2026

1.3.1 Between 7 and 14 September 2026, Piddington Parish Council undertook a formal local consultation on the proposed Crown Development at Site A, inviting written representations from residents of the parish and the immediately affected neighbouring settlements. The consultation opened on 7 September 2026 and concluded on 14 September 2026.

1.3.2 That consultation produced 82 individual written representations (some of which representing households), each submitted in objection to the application. PPC has compiled those representations into a Schedule of Individual Objections, which is provided at Appendix I in the separate accompanying bundle of appendices. PPC advances the Schedule as evidence of the nature and extent of local opposition to the proposal, and of the specific, locally grounded concerns to which the proposal gives rise. It does not adopt any individual representation as its own case, and it does not aggregate the representations into a numerical claim beyond recording their number.

1.3.3 The concerns most frequently raised in the consultation, developed in the grounds of this representation, include the unsuitability of the location and its highway access, the capacity of local infrastructure and services, the scale of the proposal relative to the receiving settlements, and the adequacy of the environmental and ecological evidence. PPC records the consultation, and appends the Schedule, so that the Secretary of State has before them the full local record.

2. The Site, the Proposal and the Decision-Making Framework

2.1 The Site

2.1.1 Site A forms part of the wider Ministry of Defence landholding at Bicester, historically the Central Ordnance Depot and Base Ordnance Depot Bicester, later the Defence Storage and Distribution Centre (DSDC) Bicester, and more recently MOD Bicester. The Home Office's published factsheet of 30 June 2026 records that the site is **no longer in active use by the Ministry of Defence**.

2.1.2 The Site lies in open countryside to the south-east of Bicester, between Piddington and Upper Arncott, with vehicular access from the B4011 via an existing secured gated entrance. Piddington village lies to the south-east; Upper Arncott to the west; Blackthorn to the east; and Ambrosden to the north-west. The surrounding land is predominantly agricultural, within the River Ray catchment. PPC notes that the B4011 in the vicinity of the Site is in places described in the application documents as subject to the national speed limit (60 mph), but is signed, and has for a considerable time been signed, at 50 mph; the application's own inconsistency on this point is addressed at 8.6.6.

2.1.3 The Site is **previously developed land**. That characterisation matters, and PPC states it plainly rather than avoiding it. In *R (Cherwell District Council) v First Secretary of State* [2004] EWHC 724 (Admin), Collins J held at [33] that the Inspector had been correct to treat the whole of the comparable site as previously developed land within the definition then applicable, and that the First Secretary of State had been entitled to attach significant weight to that fact. The same analysis is likely to be advanced by the Applicant here, and PPC's case is constructed on the footing that it will be.

2.1.4 PPC's position is that previously developed status is a materially different question from locational sustainability. Paragraph 124(c) of the National Planning Policy Framework (December 2024) gives substantial weight to the value of using suitable brownfield land within settlements. The Site is not within a settlement. Brownfield status does not answer the questions whether the location is accessible, whether it sits within the settlement hierarchy, whether infrastructure exists to serve it, or whether safe and suitable access can be achieved for all users. Those are the questions this representation addresses.

2.2 The receiving settlements

2.2.1 The settlements around the Site are small rural villages. The 2011 Census recorded the population of Piddington parish as 370 and of Arncott parish as 1,738.

2.2.2 The point that does matter, and which is not in dispute on any version of the figures, is that a facility accommodating in the order of 1,200 to 1,250 adults would introduce, at a single point in the open countryside, a resident population substantially exceeding that of any of the immediately surrounding villages, and several times the population of Piddington. None of those villages possesses the range of services, public transport connectivity, healthcare provision, retail or community infrastructure that would ordinarily be expected to support a population increase of that magnitude.

2.2.3 PPC does not advance the proposition that the surrounding villages would be required to absorb that population socially. The Applicant's own published position is that the Site would be "self-contained", with essential services provided on site precisely "to reduce the impact on local services through reducing the need for asylum seekers to leave the site". PPC's submission, developed at Section 7, is that this is an admission against interest in planning terms: a development that must be engineered to be self-sufficient because its host location cannot sustainably support it is, by definition, poorly located.

2.3 The proposal as publicly described

2.3.1 The Home Office factsheet of 30 June 2026 records the following matters, each of which is material:

Matter	Published position	Why material
Status of site	No longer in active use by the MoD	Relevant to Crown land status, to the fall-back position and to the baseline for assessment
Stage reached	Subject to detailed feasibility assessments "which could take several months to complete"; assessments "do not predetermine its future use"	Directly relevant to the urgency test (Section 5)
Duration	Site "would be used for a minimum of 10 years"	Directly relevant to urgency (Section 5), to BNG (Section 10), and to whether any permission should be time-limited (Section 19)
Occupants	Single adult males aged 18 to 65	Relevant to the Equality Impact Assessment (Section 17) and to service demand profiling
Numbers	At the date of the factsheet, "The Home Office does not give a live commentary on the number"; phased approach to full occupancy. **The application now states the capacity as up to 1,256 service users,** delivered in three phases of 408, 216 and 632	The capacity is now stated and the deficiency PPC identified is cured. PPC asks instead that any permission be limited by condition to that figure (Sections 15A and 19.3.1)
Operation	An experienced specialist provider appointed to manage the site, providing "wraparound support"	Relevant to safeguarding, oversight and enforceability (Section 16)
Design	"As self-sufficient as possible", including laundry and communal facilities	Relevant to foul drainage loading (Section 9) and to locational sustainability (Section 7)
Security	Specialist security provider on site 24/7; CCTV monitoring and recording; sign-in and sign-out at the front gate	Relevant to landscape and visual impact, external lighting and dark skies (Section 12)
Function	Occupants "would normally only be accommodated at the site during the initial processing stage"	Implies significant population turnover, with consequences for transport demand and service interface that require assessment
Healthcare	"Extensive efforts will be made to minimise the impact on local health services and provision will be determined in discussion with health partners"	An aspiration, not an assessment; the outcome of those discussions must be before the decision-maker (Section 9)

2.3.2 PPC draws attention to a tension in the factsheet. On the one hand, it states that the site is subject to feasibility work "which could take several months", that such work does "not predetermine its future use", and that "no final decision has been taken". On the other, the development has been certified as one that must be carried out as a matter of urgency. Those two positions sit uneasily together. PPC does not suggest that the two are logically incapable of coexistence. It submits that the Applicant must explain the relationship between them with specificity, and that the Secretary of State should not accept the urgency certification without that explanation.

2.3.2A PPC has received an unverified report, from a former site worker, that limited search or explosive ordnance disposal training activity may still take place on part of the Site, which if correct would qualify the factsheet's statement that the Site is no longer in active use. PPC does not adopt this as fact; it records the point as an evidence item at Appendix F, item F4.7, and invites the Applicant to confirm the current position.

2.4 The applicable decision-making framework

2.4.1 Primary legislation. Section 109 of and Schedule 10 to the Levelling-up and Regeneration Act 2023 inserted new sections 293B to 293J into the 1990 Act. Those provisions were commenced on 1 May 2025 by the Levelling-up and Regeneration Act 2023 (Commencement No. 9) and Planning and Infrastructure Act 2025 (Commencement No. 1 and Transitional Provisions) Regulations 2025 and their predecessors (SI 2025/430).

They create two routes:

- **Sections 293B–293C - the Urgent Crown Development route**, where development is of national importance *and* it is necessary that it be carried out as a matter of urgency. The application is made directly to, and determined directly by, the Secretary of State under a simplified procedure.
- **Sections 293D–293J - the standard Crown Development route**, where development is of national importance but not urgent. The application is made to the Secretary of State via the Planning Inspectorate; it is determined in the first instance by an Inspector, with a power of recovery in the Secretary of State.

  Section 293A of the 1990 Act, the previous urgency provision introduced in 2006, is replaced in England and remains in force for Wales only. Government has recorded that section 293A was never once used.

2.4.2 Secondary legislation.

- Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025, SI 2025/409 - the standard route.
- Town and Country Planning (Crown Development Applications) (Hearings and Inquiries) Rules 2025, SI 2025/410.
- Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025, SI 2025/411 - made 2 April 2025, laid 3 April 2025, in force 1 May 2025, subject to a correction slip dated 21 May 2025.
- Town and Country Planning (Consequential and Miscellaneous Amendments) Regulations 2025, SI 2025/412 - which, among other things, amend the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and regulation 70 of the Conservation of Habitats and Species Regulations 2017 to accommodate the new routes.
- Town and Country Planning (Fees and Consequential Amendments) Regulations 2025, SI 2025/418; Community Infrastructure Levy (Amendment etc.) (England) Regulations 2025, SI 2025/433.

2.4.3 Policy and guidance.

- The Written Ministerial Statement of 13 February 2025, HCWS454.
- Planning Practice Guidance, "Crown Development and Urgent Crown Development", last updated 12 May 2025 - in particular Paragraphs 027, 043, 044, 049, 053, 055, 057, 062 and 064.
- *Guidance on planning propriety: planning casework decisions*, Annex B (propriety guidance for handling Crown Development and Urgent Crown Development planning proposals).
- The National Planning Policy Framework, December 2024, which remains the Framework in force. A wholly restructured draft Framework was published for consultation on 16 December 2025; that consultation closed on 10 March 2026 and the final Framework is expected in summer 2026. Its status is addressed at Section 7.5.
- The adopted Cherwell Local Plan 2011–2031 (Part 1), adopted 20 July 2015, with Policy Bicester 13 re-adopted 19 December 2016; the Cherwell Local Plan 2011–2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, adopted September 2020; and the saved policies of the Cherwell Local Plan 1996.

2.4.4 The substantive test is unchanged by the choice of route. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination to be made in accordance with the development plan unless material considerations indicate otherwise. Government's own guidance confirms that an application under the Crown Development route falls to be determined in accordance with the development plan unless material considerations indicate otherwise, in the same way as an application made to a local planning authority. The Crown Development Orders modify procedure, not substance. PPC emphasises this because the practical pressures of a compressed timetable create a real risk that the development plan's statutory primacy is under-weighted in fact even where it is acknowledged in form.

2.4.5 The duty to give reasons. Article 18(2) of SI 2025/411 requires the decision notice to include the reasons for reaching the decision, and article 19 requires publication of the decision and of the written representations received within any representation period. The adequacy of reasons falls to be judged by the standard in *South Bucks District Council v Porter (No 2)* [2004] UKHL 33: reasons must be intelligible and adequate, must enable the reader to understand why the principal important controversial issues were decided as they were, and must not give rise to substantial doubt as to whether the decision-maker erred in law. PPC identifies in this representation the matters it submits are principal important controversial issues, so that the Secretary of State is on notice of the issues on which reasons will be required.

3. The Direct Precedent: The 2001–2005 Bicester Accommodation Centre

3.1 Why this section comes early

3.1.1 PPC places this history near the front of the representation, rather than treating it as background, because it is not merely analogous. It concerns the same landholding, the same applicant department, the same broad category of development and, in substantial part, the same planning objections. It has been the subject of a fourteen-day public local inquiry, a reasoned Inspector's report, a Secretary of State decision letter and a reasoned High Court judgment. It is, in short, the most authoritative body of site-specific planning analysis in existence for this location.

3.2 The proposal and the inquiry

3.2.1 In October 2001 the Government announced that it would establish ten asylum accommodation centres providing 3,000 places, to be taken forward on a trial basis. On 14 May 2002 the Home Office issued a Notice of Proposed Development under the then non-statutory Circular 18/84 procedure for the demolition of existing buildings and erection of an Immigration and Nationality Directorate Accommodation Centre at land at DSDC, Bicester, using the existing access from the public highway. The centre was to accommodate **750 persons**.

3.2.2 The Planning Supporting Statement recorded that centres would be located outside main urban areas because of the need to acquire large, discrete sites capable of facilitating on-site services without placing pressure on mainstream local services. By the time the inquiry opened that position had changed: ministerial statements in 2002 established that there was no policy that centres should be in rural rather than urban areas.

3.2.3 Cherwell District Council's objections were, in summary: failure to follow a sequential approach to site selection; impact on the countryside; unsustainable location; adverse impact on services provided by public agencies; and site contamination and foul and surface water drainage. Those objections map with striking closeness onto the grounds advanced in this representation.

3.2.4 The Inspector sat for fourteen days between 10 December 2002 and 3 March 2003 and reported on 18 April 2003, recommending that approval should not be given.

3.3 The Inspector's conclusions

3.3.1 The Inspector's overall conclusion is at paragraph 14.75 of his report, set out in full in the judgment of Collins J. He gave greater weight to the factors against the proposal than to those in its favour, for three reasons:

- **First**, the need to create a more sustainable pattern of development lies at the very heart of the Government's well-established approach to land use planning, and it would be inappropriate for the Government to make an exception in respect of its own development.
- **Second**, the necessity for, and the benefits of, an accommodation centre in this rural area had not been shown by the Home Office to be convincing or overriding. The Inspector considered the proposal to be driven by "the availability of some surplus Government-owned land" and by an undemonstrated belief that a rural location would aid the centre's self-containment.
- **Third**, the risk of road accidents involving pedestrian asylum seekers and others was a very real, practical worry to which the Home Office had given insufficient attention.

3.3.2 The Inspector also recorded, at paragraph 14.12, his assessment of the policy: that centres should be as self-contained as possible to avoid placing excessive burdens on local services such as schools and doctors, and that the policy was subject to assessment via the planning process. On local services, he concluded that demands on special educational needs provision and social services might well be disproportionately high, because some of those accommodated were likely to have had stressful or traumatic past experiences, and he considered it would have been reasonable to include provision for an appropriate financial contribution in the section 299A agreement. The First Secretary of State disagreed on that point.

3.3.3 On the question of duration, the Inspector recorded at paragraph 14.6 that the proposed centre would not be temporary; the Home Office saw it as a permanent development, with any failings in the trial leading to operational improvements. That is directly relevant to the present proposal's stated minimum ten-year life.

3.4 The decision, the challenge and the outcome

3.4.1 By decision letter of 18 August 2003 the First Secretary of State disagreed with the Inspector and approved the development subject to conditions and a section 299A agreement. At paragraph 19 of the decision letter he held, on the Home Office's evidence, that there was an urgent need for a trial of accommodation centres in both urban and non-urban locations, that this was an essential part of Government asylum policy. Against that national policy background, he found it was not necessary for the Home Office to demonstrate convincing reasons for a non-urban location.

3.4.2 Cherwell District Council challenged that decision on seven grounds. The claim was dismissed by Collins J on 6 April 2004: *R (Cherwell District Council) v First Secretary of State* [2004] EWHC 724 (Admin). Permission to appeal was refused. PPC records, in the interests of candour, that the Council failed on every ground, including on the relevance of alternative sites, on the sequential approach, and on the impact on local services.

3.4.3 The centre was never built. The programme was cancelled in June 2005. The National Audit Office's report on the cancellation records that approximately £28 million was spent; that the programme was cancelled in the face of significant local opposition, the success of other initiatives to speed up processing of asylum applications, and a fall in the number of people claiming asylum; that the strength of public opinion led to opposition which elongated the planning process and caused the start of work on site to slip by fourteen months, thereby raising costs; and that the number of applicants seeking asylum in the UK **halved between October 2002 and September 2003** - that is, between the announcement and the inquiry.

3.4.4 There is a further point about the land itself. The parcel that was the subject of the 2003 permission is registered under title ON255160 ("Bicester Accommodation Centre, Bicester"). That parcel was sold by the Ministry of Defence to the First Secretary of State in February 2005 for £3,250,000. It now sits on a separate title from the land that remains in Ministry of Defence ownership, registered under title ON242021 ("Land at Widnell Lane, Piddington, Bicester").

3.4.5 This matters. A planning condition binds the land to which the permission attaches. The 2003 permission carried a condition limiting occupancy to 750 persons. Where the title has since been split, it cannot be assumed that the condition runs with the parcel now proposed for use. PPC requests that the Applicant confirm, by reference to the registered titles, the precise extent of the land now proposed and which, if any, of the 2003 conditions bind it. PPC records the need to obtain the up-to-date register entries for both titles from HM Land Registry as an evidence item.

3.5 What PPC draws from this history, and what it does not

3.5.1 PPC does not submit that the 2003 permission constrains the present decision. It lapsed unimplemented; the site is different in extent and the proposal different in scale and character; the legal framework has changed fundamentally, the Crown now being subject to planning control by virtue of Part 7 of the Planning and Compulsory Purchase Act 2004 rather than enjoying the immunity discussed in *Lord Advocate v Dumbarton District Council* [1990] 2 AC 580 and applied in the 2004 judgment; and the policy framework has been recast several times.

3.5.2 PPC likewise does not submit, and could not submit, that the outcome of the 2004 challenge assists it. It plainly does not.

3.5.3 What PPC does submit is this.

(a) The planning objections have institutional pedigree.

An independent Inspector, on the evidence of a fourteen-day inquiry at this location, concluded that a smaller accommodation centre here was unsustainably located, that the case for a rural location had not been made, and that pedestrian road safety on this network was a real and under-addressed risk. The present proposal is materially **larger**. Those conclusions are not neutralised by the fact that a Minister took a different view of the planning balance; they remain the most authoritative independent assessment of this location for this use, and they are a material consideration.

(b) The assertion of urgent national need at this site has been tested by events.

In 2003 the Secretary of State proceeded on the footing that there was an urgent need for accommodation centres and that this justified departing from the Inspector's recommendation. Within two years the programme was abandoned as uneconomic, in circumstances where the underlying demand had halved during the planning process itself. That is not an argument that history will repeat. It is an argument that an asserted urgent national need is not a self-proving proposition, that demand for asylum accommodation is volatile on timescales shorter than the planning and construction cycle, and that the decision-maker should therefore require current, quantified, site-specific demand evidence across the full intended operational life of the development rather than an assertion of present pressure.

(c) The National Audit Office's own analysis identifies the mechanism of failure.

The NAO found that opposition elongated the planning process and delayed the start on site by fourteen months, and that this contributed to the scheme becoming uneconomic. That is a deliverability finding, and deliverability is a material planning consideration. It bears directly on whether a decision taken at speed, on a compressed evidential base, at a location with the characteristics identified in this representation, is capable of producing the accommodation the Applicant says is urgently required.

(d) The Inspector's recommendation on financial contributions was not implemented, and the position should not be repeated.

The Inspector considered that a contribution towards affected local services should have been secured through the section 299A agreement. If, contrary to PPC's primary case, permission were to be granted, PPC would seek exactly that: see Section 19.

(e) Awareness of harm was on the record at the time, and remained so.

The contemporaneous record shows that the potential for harm to residents was understood even as the scheme was promoted. The Prime Minister of the day acknowledged the difficulties on the record, in terms that included "I know they cause difficulties and I'm sorry", while continuing to support the scheme. That period also saw the GSL/Oakington detention-centre abuse scandal, involving the contractor originally intended to operate the Bicester centre. PPC does not rely on this as a prediction. It relies on it to show that a decision to proceed cannot be defended on the basis that the risks were unforeseen; they were foreseen, and stated, at the time.

3.6 The HMP Bullingdon comparator

3.6.1 PPC anticipates that reference may be made to the presence of HMP/YOI Bullingdon in the vicinity as evidence that facilities of this general character are established in this part of Cherwell. In the 2004 judgment, Collins J noted that the 2002–03 site, though rural, was on the edge of other development including HM Prison Bullingdon, and treated that as relevant to the weight of the objections.

3.6.2 PPC submits that the comparator should be treated with real care, for three reasons. First, a custodial establishment operating under Prison Service management is a fundamentally different land use, in planning terms, from open, non-detained accommodation operated by a private contractor. The travel patterns, the interface with the surrounding highway network, the service demands and the community relationship are all different. Second, the presence of one institutional use in a rural location is not, in planning terms, a justification for another; the cumulative effect of concentrating institutional uses at a single rural location is itself a matter requiring assessment. Third, any highways, drainage, ecological or infrastructure baseline generated in connection with Bullingdon is now materially out of date and cannot discharge the Applicant's evidential obligations in respect of this proposal.

PART B - PROCEDURAL AND JURISDICTIONAL GROUNDS

4. Ground 1: National Importance Is Not Established at the Level of This Site

Status in Version 4.0	**STANDS. A Statement on National Importance has been submitted and does address the Written Ministerial Statement criteria. It quantifies a national requirement but does not quantify this Site's contribution to it, and none of the four questions posed at 4.3.3 is answered.**
Assessed at	Section 4.4 below

4.1 The statutory and policy test

4.1.1 Neither Crown Development route is available unless the Secretary of State is satisfied that the development is of national importance. Under article 6(1)(c)(iv) of SI 2025/411 an urgent Crown development application must be accompanied by a statement setting out the reasons the applicant considers that the development is of national importance **and** that it is necessary that the development be carried out as a matter of urgency. Article 6(1)(c)(v) requires a separate statement of the reasons the applicant considers the application acceptable in planning terms.

4.1.2 The criteria are set out in the Written Ministerial Statement of 13 February 2025 (HCWS454) and reproduced in Planning Practice Guidance Paragraph 043 (Reference ID 44-043-20250512). The Secretary of State will in general consider development to be of national importance only if, in their opinion, it would:

- involve the interests of national security or of foreign governments;
- contribute towards the provision of national public services or infrastructure, such as new prisons, defence, or border infrastructure;
- support a response to international, national, or regional civil emergencies; or
- otherwise have significant economic, social, or environmental effects and strong public interest at a regional or national level.

4.2 PPC's analysis of each limb

4.2.1 Limb (a) - national security or foreign governments.

The Site is not proposed for a defence, security or intelligence function. The Applicant's own factsheet records that it is no longer in active use by the Ministry of Defence and that the proposed use is accommodation operated by a private contractor. PPC does not understand limb (a) to be relied upon, and invites confirmation. This matters procedurally: if any part of the application is the subject of a sensitive-information direction under section 293B(11) of the 1990 Act, article 12 of SI 2025/411 disapplies the disclosure requirements of the Order in relation to that information, and PPC would need to know the extent of any such direction in order to understand what it is and is not able to comment upon. PPC requests express confirmation whether any direction under section 293B(11) has been sought or made.

4.2.2 Limb (b) - national public services or infrastructure.

The examples given in guidance, prisons, defence, border infrastructure, share a common character: they are functions of the State that can only be discharged through State-provided facilities, and the facility itself performs the national function. Asylum accommodation is capable of being provided in many forms and in many locations, including dispersal accommodation, houses in multiple occupation, medium-sized sites and, at present, hotels. The Government's own stated strategic direction is to move **away** from concentrated contingency provision. PPC does not say limb (b) is incapable of applying to asylum accommodation. It says that if it is relied upon, the Applicant must explain why a facility that is one of several means of discharging a statutory duty under sections 95 and 96 of the Immigration and Asylum Act 1999 is properly characterised as national infrastructure, and why that characterisation attaches to **this site** rather than to the accommodation estate in the abstract.

4.2.3 Limb (c) - civil emergency.

No civil emergency has been declared or asserted. PPC notes the contrast with the Class Q permitted development right in Part 19 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, which was the mechanism used at RAF Wethersfield and RAF Scampton and which turns on an "emergency" defined as an event or situation threatening serious damage to human welfare, the environment or national security. In *R (Clarke-Holland, West Lindsey District Council and Braintree District Council) v Secretary of State for the Home Department* [2023] EWHC 3140 (Admin), Thornton J held that the Secretary of State was entitled to rely on Class Q once there was a threat of serious damage to human welfare by virtue of homelessness. That was a decision on a differently worded provision, in different factual circumstances, and in 2023. It does not establish that a civil emergency exists in July 2026, and the Government's own published figures (Section 5.4) point the other way.

4.2.4 Limb (d) - significant effects and strong public interest at regional or national level.

This is the limb PPC expects to be principally relied upon, and PPC accepts that the national asylum accommodation system, viewed in aggregate, is a matter of significant public interest. PPC's objection is to the transposition of a system-level public interest onto a single-site planning decision.

4.3 The transposition problem

4.3.1 The difficulty may be stated shortly. If a generalised national policy interest in providing asylum accommodation is sufficient, without more, to render **any** site selected for that purpose nationally important, then the national importance test performs no filtering function at all in this class of case. Every site the Home Office selects would qualify, whatever its planning characteristics, and the gateway that Parliament and the Minister evidently intended would be reduced to a formality.

4.3.2 That cannot be right, for three reasons.

(a) The Minister's own statement contemplated safeguards.

The Written Ministerial Statement introducing these routes acknowledged the need for appropriate safeguards on the use of these powers and for transparency, not only with those involved but with Parliament. The notification arrangements, notice to the local Member of Parliament, deposited in the libraries of both Houses, are the visible expression of that intention. Those safeguards are meaningful only if the anterior tests are applied with rigour.

(b) Guidance requires an opinion, formed on evidence.

PPG Paragraph 043 requires the Secretary of State to determine whether, **in their view**, the proposal is of national importance, applying the WMS principles. That is a judgement to be formed on material. Where the material amounts to a general assertion about system pressure, the judgement is not informed at the site level at all.

(c) The consequences of the classification are substantial.

Classification as nationally important removes the application from the local planning authority. Classification as *urgent* removes it additionally from independent determination by an Inspector, and removes the guaranteed publicity, consultation and representation periods that would otherwise apply. The greater the procedural consequence, the more exacting the scrutiny of the anterior test ought to be.

4.3.3 PPC therefore submits that the Applicant's Statement of National Importance must be tested by reference to the following questions, and that the Secretary of State should require answers to them before forming the requisite opinion:

- What quantified national or regional accommodation requirement is asserted, over what period, and on what published data?
- What proportion of that requirement would this Site meet?
- What is the site-specific contribution said to justify treating **this** site as nationally important, as distinct from the programme of which it forms part?
- If the answer is that the Site is one of several interchangeable means of meeting a fungible national requirement, on what basis is its individual planning impact said to be outweighed at the national importance stage rather than at the planning balance stage?

4.3.4 PPC's position is that questions of this kind are not answered by the material presently in the public domain, and that if the Applicant's statement does not answer them the Secretary of State should not be satisfied that the test is met in respect of this Site.

4.4 The position following publication of the application documents

What the application confirms

4.4.1 The Statement on National Importance relies on limbs (b), (c) and (d) of the Written Ministerial Statement criteria. Its treatment of limb (c) is conditional on its own terms: "where numbers significantly exceed available capacity, for example, during seasonal surges in asylum numbers, the resulting risk of widespread destitution and pressure on essential public services **may** engage serious impacts on human welfare and amount to a civil emergency." No civil emergency is asserted as existing.

4.4.2 The evidence adduced is national. It comprises published asylum statistics, together with two items of "Internal management information, Home Office ... statistics, March 2026" which are not published and cannot be tested.

4.4.3 The site-specific justification offered is that the Site "would provide a controllable and self-contained component of the wider asylum estate, including surge capacity, which can be brought into use to meet UK-wide pressures". That is a description of the characteristics the Applicant seeks in any large site. It is not a statement of anything particular to Site A. On the Applicant's own framing the accommodation places are fungible, which is the premise of PPC's submission at 18.2.1(b) as to the weight properly attaching to the benefit.

4.4.4 None of the four questions at 4.3.3 is answered. No proportion of the national requirement is attributed to this Site; no year-by-year profile is given; and no forecast across the intended operational life is provided.

What assists the Applicant

4.4.5 PPC records, in fairness, that a statement under article 6(1)(c)(iv) has been produced, that it engages with each limb of the Written Ministerial Statement criteria, and that the proposition at limb (b), that the provision of asylum accommodation to destitute persons is a public service arising from the statutory power under the Immigration and Asylum Act 1999, is a proper one which PPC does not dispute.

What remains outstanding

4.4.6 PPC repeats the requests at 4.3.3 and 5.4.5, and adds two. First, that the two items of internal management information relied upon be published or that reliance on them be withdrawn. Second, that the Applicant correct the citation of its own statutory basis: the Statement cites "article 6(1)(iv)" of SI 2025/411, which is not a provision of that Order. The requirement is at article 6(1)(c)(iv).

5. Ground 2: The Urgency Test Is Not Satisfied

Status in Version 4.0	**STANDS AND IS STRENGTHENED. The comparative limb of the guidance test is now addressed, which Version 3.0 could not assume. But the deadline asserted is the Applicant's own programme assumption, the consequence is not quantified, the self-set approval deadline of late August 2026 passed without a decision, and the Applicant's own consultants record that the scheme cannot presently be designed.**
Assessed at	Section 5.8 below, and Section 5A

5.1 The test

5.1.1 For the urgent route, the Secretary of State must be satisfied of a second and cumulative matter: that it is **necessary that the development be carried out as a matter of urgency** (section 293B of the 1990 Act; article 6(1)(c)(iv) of SI 2025/411).

5.1.2 PPG Paragraph 027 (Reference ID 44-027-20250512), reflecting the Written Ministerial Statement, articulates the test with precision. The Secretary of State will only consider urgency established **where the applicant can demonstrate the need for an expedited planning process**. Specifically, the applicant will need to demonstrate:

- that the proposed development **will need to be made operational to an accelerated timeframe that is unlikely to be feasible using other application routes, including [the standard] Crown Development** route; and
- **evidence of the likely consequences of not securing a decision within the accelerated timeframe.**

5.1.3 Three features of that test are important and are, in PPC's submission, frequently overlooked.

(a) It is comparative, not absolute.

The question is not whether the development is needed soon. It is whether the timeframe required is *unlikely to be feasible* by another route. The standard Crown Development route is itself an expedited, centrally determined procedure with statutory time limits, a default hearing procedure adopted specifically "in order to enable a timely determination", and no local authority determination stage. The comparator is therefore not the ordinary local planning application process; it is a route already designed for speed.

(b) It requires evidence of consequence.

The applicant must adduce evidence of what would happen if a decision were not secured within the accelerated timeframe. Assertion is not evidence.

(c) It relates to the decision, not the development.

Urgency in section 293B is concerned with the need for an expedited *planning process*. It is not established by showing that the development, once permitted, would be long-lived or valuable.

5.2 The Applicant's own published material contradicts the urgency case

5.2.1 The most significant single point on this ground is that the Home Office's own factsheet, published on 30 June 2026, five days after the announcement and within weeks of the application, states that the Site is subject to **detailed feasibility assessments which could take several months to complete**, that those assessments are **routine exploratory work to understand the site's potential**, that they **do not predetermine its future use**, and that **no final decision has been taken on the site's future use**.

5.2.2 PPC invites the Secretary of State to consider what follows. If the Applicant's own position is that several further months of feasibility work are required before it can determine whether the Site is suitable, then:

- the Applicant cannot presently know when, or whether, the development will proceed;
- the Applicant cannot presently demonstrate that the development "will need to be made operational to an accelerated timeframe";
- the several months said to be required for feasibility work are, on any view, of the same order as the additional time that determination under the standard route would take; and
- the "consequences of not securing a decision within the accelerated timeframe" cannot be evidenced, because the accelerated timeframe is not defined and the decision to use the site has not been taken.

5.2.3 Put shortly: a proposal that is not yet ready to be built, on a site not yet confirmed as suitable, does not require a planning decision so urgently that the standard Crown Development route is infeasible. PPC submits that this is a complete answer to the urgency certification on the material currently published, unless the Applicant produces specific evidence to the contrary.

5.3 The stated minimum ten-year operational life

5.3.1 The factsheet states that the Site "would be used for a minimum of 10 years", and describes making use of existing basic accommodation on MoD sites as "just the first step" in the Government's work to exit hotels and source more appropriate accommodation.

5.3.2 PPC accepts, as noted at 5.1.3(c), that duration and urgency are analytically distinct. But the two are not unrelated, for two reasons.

(a) A decade-long estate commitment is a strategic acquisition, not an emergency measure.

It requires capital investment, a long-term operating contract, and as the Applicant's own description of on-site healthcare, laundry, communal facilities and waste management indicates the construction of substantial permanent or semi-permanent infrastructure. Developments of that character are the paradigm case for the standard route, which exists precisely to determine nationally important but non-urgent Crown development with proper scrutiny.

(b) The duration bears directly on the evidence required.

If permission is sought for a minimum of ten years, the demand evidence must extend across that period. It is not sufficient to evidence present pressure. The Applicant must show anticipated demand to the mid-2030s, against the background of the Government's own stated objective of ending hotel use and reducing the asylum accommodation estate and cost.

5.3.3 PPC notes that duration evidence of this character has previously proved probative in litigation concerning comparable sites, where evidence of longer-term contracting arrangements was deployed to test the characterisation of a scheme as a short-term emergency response. PPC does not overstate the point: the substantive challenges at Wethersfield and Scampton ultimately failed (Section 5.6). But the analytical distinction between an emergency response and a long-term estate commitment is one the courts have engaged with, and it applies here with unusual clarity because the Applicant's own published minimum duration is explicit.

5.4 The Government's own published statistics on the underlying pressure

5.4.1 The asserted national importance and urgency rest on "sustained pressure on the asylum accommodation estate" and the need to reduce reliance on hotels. PPC's submission is that the Government's own published data materially qualifies that proposition, and that the Applicant must address the qualification directly.

5.4.2 In the same statement to the House of Commons on 25 June 2026 in which the three further sites were announced, the Minister of State reported that:

- **hotel use had more than halved from its peak**, with just under 170 asylum hotels remaining in use, down from around 400 at the height of reliance on hotels;
- **the number of people accommodated in hotels had been cut by more than half**, from a peak of approximately 56,000 in 2023 to approximately 21,000;
- as at March 2026 the number in hotels was down approximately **35 per cent** on the same point the previous year;
- asylum decisions were being made at approximately **four times** the rate of the preceding administration; and
- a further twenty hotels had been announced for closure.

5.4.3 PPC does not deploy those figures to suggest that no accommodation requirement exists. It deploys them for a narrower and, it submits, unanswerable proposition: a pressure that the responsible department reports as having more than halved, and as continuing to fall at approximately a third year-on-year, cannot without specific further evidence sustain a certification that a *planning decision* on a particular site is required so urgently that the standard statutory route is infeasible.

5.4.4 PPC further notes the National Audit Office's analysis of the asylum system published in December 2025, which records that in 2024-25 the Home Office spent approximately £3.4 billion on asylum accommodation and support excluding unaccompanied asylum-seeking children, comprising approximately £2.7 billion on direct accommodation spending, approximately £220 million on cash support and approximately £247 million in grants to local authorities for dispersal accommodation. The direction of travel in expenditure, as in occupancy, is downward from the 2023-24 peak.

5.4.5 PPC accordingly requests that the Applicant be required to produce, and the Secretary of State to publish:

- the current forecast of asylum accommodation demand, by accommodation type, to 2036;
- the assumed contribution of Site A to that forecast, year by year;
- the assumptions as to intake, decision rates, appeal disposal and returns underpinning that forecast; and
- the assessed consequence of a decision on this application being taken under the standard route rather than the urgent route, expressed in months and in accommodation places.

5.5 The comparator that proves the point: Cameron Barracks

5.5.1 In the same announcement of 25 June 2026, the Home Office confirmed that, **following detailed assessments**, it would **not** proceed with Cameron Barracks as a potential asylum accommodation site.

5.5.2 That is a significant and helpful piece of evidence, and PPC relies on it. It demonstrates that the Applicant's own feasibility process is a genuine one, capable of concluding that a site is unsuitable. It follows that the outcome of the feasibility assessments at Site A - which the Applicant says may take several months - is genuinely open. And it follows in turn that a planning permission granted now, under an emergency-designed procedure, on a compressed evidence base, may be granted for a development that the Applicant subsequently decides not to pursue. That is not an efficient use of the urgent procedure; it is a misuse of it.

5.6 The lesson of the Wethersfield and Scampton litigation, stated accurately

5.6.1 PPC's earlier draft summarised this litigation imprecisely. The accurate position is as follows.

- *Braintree District Council v Secretary of State for the Home Department* [2023] EWHC 1076 (KB) (Waksman J, 21 April 2023): the Council's claim for an injunction under section 187B of the 1990 Act was struck out for want of the consent required by section 296A(2).
- *Braintree District Council v Secretary of State for the Home Department & Anor* [2023] EWCA Civ 727, [2023] 1 WLR 3087 (Court of Appeal, 23 June 2023, Lindblom SPT, Dingemans and Whipple LJJ): the appeal was dismissed.
- *R (Clarke-Holland, West Lindsey District Council and Braintree District Council) v Secretary of State for the Home Department & Anor* [2023] EWHC 3140 (Admin) (Thornton J, 6 December 2023): all three claims challenging reliance on Class Q and the environmental screening directions were dismissed.
- *TG and others v Secretary of State for the Home Department* [2025] EWHC 596 (Admin) (Mould J, 14 March 2025): the individual welfare and equality claims of three of four lead claimants succeeded in part, and a systemic public sector equality duty ground succeeded; the remaining grounds, including those advanced by the fourth claimant, failed. This case is analysed at Section 16.

- *Epping Forest District Council v Somani Hotels Ltd*: an interim injunction under section 187B restraining use of a hotel for asylum accommodation was granted by Eyre J on 19 August 2025 but the appeal against it was allowed by the Court of Appeal on 29 August 2025; at trial in November 2025 Mould J declined final relief, holding that an injunction would not be an appropriate means of enforcing planning control given the continuing need for the Home Secretary to fulfil her statutory duties; the Court of Appeal subsequently refused the council permission to appeal.

5.6.2 PPC draws two conclusions from that record, and states them frankly because a representation that overstates its legal position assists no one.

(a) Retrospective litigation against decisions to use Crown or Crown-adjacent land for asylum accommodation has a poor record.

Where challenges have succeeded, they have done so on discrete failures, equality assessment, individual welfare decisions, rather than on the jurisdictional or planning merits. Courts have consistently attached substantial weight to the Home Secretary's statutory duty to accommodate destitute asylum seekers.

(b) That is precisely why the 2025 statutory regime matters, and why the choice between its two routes matters.

The regime Parliament created in 2023 and commenced in 2025 is a front-loaded, evidence-based, consultative statutory procedure with a published register, statutory consultation, published representations, a reasoned decision and, under the standard route, determination by an independent Inspector following a hearing or inquiry. It offers, in principle, exactly what the improvised mechanisms used at Wethersfield and Scampton did not: an opportunity for the planning merits to be tested **before** a decision is taken.

5.6.3 The value of that opportunity is, however, entirely dependent on which route is used. If the urgent route is used, the independent Inspector is removed, the hearing or inquiry is removed, the guaranteed publicity and representation periods are removed (see Section 6), and what remains is a written process with no statutory minimum duration for non-EIA development. PPC's submission is that the choice of route in this case would substantially negate the improvement the 2023 reforms were designed to deliver.

5.7 Relief sought under Grounds 1 and 2

5.7.1 PPC's primary submission is that the Secretary of State should decline to accept the urgency certification and should not determine the application under section 293B.

5.7.2 PPC's alternative submission, if national importance is accepted, is that the proposal should proceed under the **standard** Crown Development route under sections 293D to 293J of the 1990 Act and SI 2025/409, determined in the first instance by an independent Planning Inspector. PPC submits that, given the scale of the development, the number of principal important controversial issues identified in this representation, and the volume of technical evidence that will require testing, the **inquiry** procedure under SI 2025/410 would be the appropriate procedure, alternatively a hearing.

5.7.3 PPC emphasises that this relief does not deny the Home Office the ability to pursue the development. It ensures that a development of this significance receives the scrutiny its impacts warrant, and - on the evidence of the 2001–2005 programme - materially improves the prospect that any decision taken is robust, defensible and capable of implementation.

5.8 The position following publication of the application documents

What assists the Applicant

5.8.1 PPC records first, and candidly, the respect in which the Applicant's position is better than Version 3.0 assumed. The Statement on National Importance does engage with the comparative limb of the test at PPG Paragraph 027. It states: "The 'non-urgent' Crown Development route is understood to take approximately 12 weeks to determine applications and 16 weeks for EIA applications. Those timescales would delay determination to late autumn 2026, pushing delivery of initial bedspaces well into 2027 once allowance is made for mobilisation, procurement, and discharge of conditions." It addresses and rejects a Special Development Order and reliance on Class Q of Part 19 of the General Permitted Development Order. Version 3.0 proceeded on the footing that the comparative exercise might not be attempted at all; it has been.

What the application confirms, and why the ground is strengthened

5.8.2 (a) The asserted deadline is the Applicant's own. The Statement records: "Planning permission is required by late summer to allow works to begin to maintain the programme critical path. **Current programme assumptions are to submit the Urgent Crown application by July, secure Urgent Crown approval by late August 2026** to enable required works to be completed." A programme assumption set by the Applicant is not an external constraint. PPG Paragraph 027 asks whether the development "will need to be made operational to an accelerated timeframe that is unlikely to be feasible using other application routes". A timeframe the Applicant has chosen, and can revise, does not without more establish that.

5.8.3 (b) That deadline has passed, and the consequence predicted has not been shown to follow. The Applicant's stated assumption was approval by late August 2026. The EIA screening direction was not issued until 26 August 2026 and no decision on the application had been made by that date. On the Applicant's own account the critical path has already been missed by the operation of the process it selected.

5.8.4 (c) The consequence evidence is not quantified. Paragraph 5.4.5 asked for the assessed consequence of determination under the standard route rather than the urgent route, expressed in months and in accommodation places. The Statement expresses it in neither. Its consequences are stated qualitatively: reduced ability "to manage fluctuations in demand, maintain contingency headroom and move service users through the estate", and compression of "procurement and mobilisation activity into a shorter period".

5.8.5 (d) Most significantly, the scheme cannot presently be designed. Urgency in section 293B concerns the need for an expedited planning **decision**. The Applicant's own consultants record that the foul drainage solution is undetermined and its viability unknown; that no intrusive ground investigation has been carried out; that nine protected species surveys are outstanding; that the outfall for the proposed treatment works has not been identified and its environmental permit not applied for; that the existing electrical infrastructure "cannot be relied upon"; and that topographical data for parts of the Site remains "in the process of finalisation". A development in that condition cannot be delayed in any material respect by the four to eight weeks which, on the Applicant's own figures, separate the two routes.

5.8.6 PPC accordingly maintains the submission at 5.2.3, in a form the application has reinforced rather than answered: a proposal that is not yet ready to be built does not require a planning decision so urgently that the standard Crown Development route is infeasible.

What remains outstanding

5.8.7 The assessed consequence of determination under the standard route rather than the urgent route, expressed in months and in accommodation places; and a current programme identifying the critical path activities and the date by which each outstanding survey, investigation, consent and permit is expected to be completed.

5A. The Chronology of the Application and the Order in Which the Evidence Was Produced

5A.1 Why PPC advances this section

5A.1.1 This section is new in Version 4.0. It could not have been written before the application documents were published, because it depends on the dates those documents bear.

5A.1.2 PPC advances it for a single, narrow purpose. It is not an allegation of bad faith, and PPC does not invite the Secretary of State to make any finding about the Applicant's motives. It is a submission about the **order** in which things were done, and about what that order shows as to the function the technical assessments have in fact performed.

5A.1.3 The proposition is that the assessments followed the decision in principle rather than informing it. If that is right, it matters in four distinct ways, each of which is a matter of law or policy rather than of impression:

- **Urgency.** PPG Paragraph 027 requires the applicant to demonstrate a need for an expedited **planning process**. A deadline generated by the applicant's own delivery programme is not such a demonstration (Section 5.8.2).
- **Fairness.** The *Gunning* criteria, endorsed in *R (Moseley) v Haringey London Borough Council* [2014] UKSC 56, require consultation at a formative stage, and sufficient reasons to permit intelligent consideration (Section 6.3).
- **Assessment.** Paragraphs 189 to 191 of the Framework require the decision-maker to be satisfied on adequate site investigation information that the site is suitable for its proposed use. The Environmental Impact Assessment Regulations 2017 require environmental information to inform the decision. Neither is satisfied by assessment which post-dates or is programmed around the decision.
- **The public sector equality duty.** In *R (Bracking) v Secretary of State for Work and Pensions* [2013] EWCA Civ 1345 at [25]-[26] the Court of Appeal held that the duty must be discharged in substance, with rigour and an open mind, **before and at the time of** the decision, and not as a rear-guard justification.

5A.1.4 The full chronology, with sources, is scheduled at **Appendix G**. This section states the six propositions PPC draws from it.

5A.2 First: the application was in preparation before the proposal was announced

5A.2.1 The sequence of the four events in June and July 2026 is not in dispute, because each is evidenced by a dated document in the application itself or on the public record.

Date	Event	Source
21 November 2025	An enquiry is submitted to National Grid Electricity Transmission in respect of the Site. The enquiry record gives "Work Types **Commercial/industrial**"	Utilities and Infrastructure Assessment, Appendix C
November 2025	The Ministry of Defence "was first informed of proposals to use MOD Bicester for asylum accommodation"	Written parliamentary answer, UIN 16355, answered 9 July 2026
16 June 2026	Notice under article 4 of SI 2025/411 is served on the Ministry of Defence, describing an application for the phased provision of non-detained asylum accommodation "to accommodate up to 1,256 service users"	Article 4 Application Notice
25 June 2026	The Minister of State tells the House of Commons that three further former Ministry of Defence sites are **under consideration**, "subject to feasibility assessments, planning permission and the necessary approvals"	Ministerial statement, 25 June 2026
25 June 2026	The application form is signed. The Planning Proposal Statement is issued at Revision B, "Final draft"	Application form; Planning Proposal Statement revision history
30 June 2026	The Home Office publishes a site factsheet stating that the Site is subject to detailed feasibility assessments "which could take several months to complete", that these are routine exploratory work, that they "do not predetermine its future use", and that no final decision has been taken	Home Office factsheet, 30 June 2026

5A.2.2 Three points follow.

5A.2.3 (a) The formal notice required by article 4 was served on 16 June 2026, **nine days before** the proposal was announced to Parliament, and it already described a development of a defined character for a defined capacity of 1,256 persons.

5A.2.4 (b) The application form was signed on **25 June 2026, the same day** on which the Minister described the site as under consideration subject to feasibility assessments and planning permission. The principal planning document was in "Final draft" on the same date.

5A.2.5 (c) The factsheet published **five days later** stated that feasibility assessments could take several months and did not predetermine the site's future use. PPC does not say that those two positions are logically incapable of coexistence; it said as much at paragraph 2.3.2. It says that the Applicant must explain the relationship between them with specificity, and that the dates now make that explanation more, not less, necessary. A signed planning application is not consistent with a site whose future use has not been determined.

5A.2.6 PPC records, in fairness, that it is ordinary and proper for a government department to prepare an application before announcing it, and PPC makes no criticism of that practice as such. The relevance of the sequence is narrower: it bears directly on the weight to be given to the factsheet's statement that the feasibility work "does not predetermine" the use, which is the statement on which paragraph 5.2 of this representation relies.

5A.3 Second: the technical evidence was produced to a compressed programme

5A.3.1 All of the principal site survey work relied upon in the application was carried out within a ten-week window between late February and mid-April 2026.

Date	Survey or site visit	Document
25 February 2026	Drainage site inspection with the MOD site team	Drainage Design Statement
26 February 2026	Flood risk site visit	EIA Screening Direction Request
23 February or 11 March 2026	Heritage walkover survey (the assessment gives both dates)	Archaeological and Heritage Assessment
26 March 2026	Landscape and visual site visit	Landscape and Visual Statement
26 March 2026	Highways site visit	EIA Screening Direction Request
26 March to 10 April 2026	Extended habitat survey	Preliminary Ecological Appraisal
2 April 2026	Groundsure environmental database report obtained	Preliminary Geo-environmental and Geotechnical Assessment
16 April 2026	Automatic traffic count installed at RAF Wethersfield	Transport Assessment

5A.3.2 PPC makes no complaint about efficiency. Its point is that in at least three instances the programme, and not the subject matter, determined when and how the work was done.

5A.3.3 (a) The ecological survey was carried out outside its own recommended season. The Preliminary Ecological Appraisal states: "The optimal period to undertake an extended UKHab survey is April-September, inclusive. The survey was undertaken in late March, which is just outside the optimal survey window." It further states that the assessment proceeded "from only a single visit" and that "This report cannot, therefore, be considered a comprehensive assessment of the ecological interest of the site." Nine further surveys remain outstanding.

5A.3.4 (b) The Preliminary UXO Risk Assessment of 31 March 2026 assesses a different scheme. It states at section 3.2 that "The proposed scheme consists of the work is understood to construction of accommodation for **3,510 service users**", and gives the area of investigation as 50.5 hectares. The application is for 1,256 service users on 10.22 hectares. The report states at section 2.2: "**As a construction project has not yet been defined for this site, it is not possible to complete a UXO Detailed Risk Assessment (UXO-DRA), as the method of construction in relation to potential UXO has not been established.**" As at 31 March 2026, therefore, the construction project had not been defined.

5A.3.5 (c) The Flood Risk Assessment was not written for this development. Its stated purpose is "to support the consideration of future development", it assesses a site area of 50.1 hectares against an application red line of 10.22 hectares, and it refers throughout to "any future development" rather than to the development applied for. It expressly declines to classify the flood vulnerability of the proposed use, stating only that "It is possible that any future development may be at a higher vulnerability". The wider assessment fails to provide a bespoke appraisal and assessment of development particularly on existing hardstandings.

5A.3.6 (d) The Habitats Regulations Assessment screening is limited to two pre-application documents. Its section 1.7 states that it "only considers the details of the Proposed Development that are described within the Site Feasibility Study prepared by [ ] (2025) and the Scoping Report from the Home Office (Home Office, 2026)", and warns that if "the consented elements differ to those within the Site Feasibility Study and Scoping Report, the competent authority may request further information under Regulation 63(2) of the Habitats Regulations in the form of an updated RIAA." Neither of those documents has been submitted, so neither the decision-maker nor any consultee can know whether they differ.

5A.4 Third: the revision history discloses compression

5A.4.1 The revision histories borne by the submitted documents are as follows.

Document	Revision history
Planning Proposal Statement	Draft 4 June 2026; Revision A 19 June "Draft for comment"; Revision B 25 June "Final draft"; Revision C 30 June "Final for client review"; **Revision D 6 July "Final for submission"** - five revisions in thirty-two days
Transport Assessment	D01 7 May 2026 "Draft"; D02 7 June 2026 "Final"
Travel Plan	Revision 1 7 May 2026 "Draft"; Revision 2 5 June 2026 - **still "Draft"**
Flood Risk Assessment	P01 May 2026 "First Issue"; P02 June 2026 "Second Issue following client approval"
Landscape and Visual Statement	P01 30 April 2026 "First Issue"; P02 21 May 2026 "Final Issue"
Preliminary Geo-environmental and Geotechnical Assessment	P01 April 2026 "First Issue"; P02 May 2026 "Final"
Preliminary Ecological Appraisal	V1 13 May 2026 "Final, First Issue"

5A.4.2 Two observations follow. First, the Travel Plan submitted with the application remains, on its own face, a draft. Second, Revision D of the Planning Proposal Statement, marked "Final for submission", contains at least twenty numbered paragraphs which carry a heading but no text, three sentences from which the operative figure is missing, a list of recreational facilities consisting of a single empty bullet, and an unresolved cross-reference reading "Error! Bookmark not defined."

5A.4.3 PPC does not rely on drafting defects as objections in themselves. It relies on them, together with the dates, as evidence of the compression under which the material was produced, and as bearing on the weight the decision-maker can place on it.

5A.5 Fourth: the principle was determined before the environmental gateway question was answered

5A.5.1 The determinative sequence after submission is as follows.

Date	Event	Elapsed
3 July 2026	The Applicant requests an EIA screening direction	Three days **before** the application is submitted
6 July 2026	The application is submitted. The Noise and Air Quality Technical Notes are "being finalised" and are not submitted	-
13 July 2026	The Minister of State informs the local Member of Parliament that the proposal "has been deemed Nationally Important and Urgent"	7 days after submission
16 July 2026	The Home Office answers Natural England's outstanding question of 4 June, stating that hydrological connectivity to the SSSI cannot be confirmed but is likely, and deferring quantification to a later design stage	3 days **after** the determination
20 July 2026	Cherwell District Council, as relevant local planning authority, is notified of the determination	14 days after submission; 7 days after the Member of Parliament
23 July 2026	Natural England advises that a hydrological connection to the SSSI "cannot be ruled out", records two premises which the Applicant's own June 2026 drainage report had abandoned, and requires re-consultation	-
26 August 2026	The Secretary of State directs that the proposal is not EIA development	51 days after submission; **44 days after the determination of national importance and urgency**

5A.5.2 Four points follow.

5A.5.3 (a) The national importance and urgency determination, which fixes the procedural route and with it the extent of the public's and consultees' rights, was made within seven days of submission and forty-four days before the environmental screening question was answered. The route was chosen before the gateway question was decided.

5A.5.4 (b) The relevant local planning authority was informed seven days after the local Member of Parliament. PPC makes no criticism of the notification to the Member of Parliament, which is a safeguard the Written Ministerial Statement contemplated. It records the ordering because Cherwell District Council is the body whose development plan governs the decision and whose officers would need the longest lead time to respond.

5A.5.5 (c) The screening request of 3 July 2026 preceded the submission of the application on 6 July 2026, preceded the finalisation of the Noise and Air Quality Technical Notes, and preceded Natural England's substantive advice on the SSSI hydrological pathway by twenty days. PPC develops at Section 16.6 the further point that the screening request describes the foul drainage arrangement in terms which the Applicant's own June 2026 Drainage Design Statement had by then superseded.

5A.5.6 (d) The Air Quality Screening Technical Note bears the date **26 June 2026** and is marked "Issue 1, First Issue". The covering letter of **6 July 2026** describes it as one of two documents "being finalised". PPC does not know how to reconcile those two statements and asks that the position be clarified.

5A.6 Fifth: the consultation which would have informed the assessments did not occur

5A.6.1 The following are recorded in the Applicant's own documents:

- Transport Assessment, paragraph 1.4.2: "Due to the planning application route being used and the fast-track nature of the proposals **no pre-application scoping discussions have been held with the local planning and highway authorities** prior to the preparation of this TA."
- Drainage Design Statement, paragraph 8.1: "Conservative assumptions have been adopted at this stage due to **limited engagement with Statutory Utilities Undertakers, the LPA, LLFA, and other stakeholders**."
- Drainage Design Statement, paragraph 9.2: "**It has not been possible to liaise with the statutory undertaker within the RIBA 2 design programme**; however, it is recommended that this be undertaken at the earliest opportunity."
- Utilities and Infrastructure Assessment, paragraph 4.5: the proposals are based on assumptions "due to limited surveys, **no stakeholder engagement**, and incomplete site information".

5A.6.2 The first of those passages is the most significant, because it identifies the cause. The Applicant's transport consultant states that the reason no scoping took place with the highway authority is "the planning application route being used and the fast-track nature of the proposals". The choice of the urgent route is thus given, in the Applicant's own evidence, as the reason why the assessment was not scoped with the authority best placed to scope it.

5A.7 Sixth: what PPC submits follows

5A.7.1 PPC does not submit that the Applicant acted improperly. It submits that the record establishes, on the Applicant's own dated documents, that:

- notice of a defined application was served nine days before the proposal was publicly announced, and the application form was signed on the day of the announcement;
- the technical fieldwork was carried out in a ten-week window, in at least one case outside the recommended survey season, and in at least three cases before the scheme was defined or by reference to a different scheme;
- the procedural route was fixed within seven days of submission and forty-four days before the environmental screening question was decided;
- the consultation which would have shaped the assessments did not take place, and the Applicant's own consultant identifies the choice of route as the reason; and
- substantial elements of the technical work are, in the consultants' own words, still to be done.

5A.7.2 The conclusion PPC invites is not that the application should be refused because it was prepared quickly. It is that the material now before the Secretary of State is the product of a process in which assessment followed decision, that this is precisely the risk the statutory and policy framework exists to guard against, and that the appropriate response is the one Planning Practice Guidance provides: to require the outstanding information under Paragraph 057 before determining, and to redirect the application to a route in which the evidence can be tested.

5A.8 Relief sought under this section

5A.8.1 PPC requests that the Secretary of State:

- require the Applicant to state, by reference to its own programme documents, the date on which the decision in principle to proceed with Site A was taken, and the date on which each technical assessment was commissioned;
- require an explanation of the relationship between the factsheet of 30 June 2026 and the signature of the application form on 25 June 2026;
- require the Applicant to explain the discrepancy between the date borne by the Air Quality Screening Technical Note and the statement in the covering letter that it was being finalised;
- require the Applicant to produce the Site Feasibility Study (2025) and the Home Office Scoping Report (2026) on which the Habitats Regulations Assessment screening is expressly based, and confirm whether the consented elements differ from those described in them; and
- record in the decision, as part of the reasons required by article 18(2), the sequence in which the technical assessments were produced and the extent to which each informed rather than followed the proposal.

6. Ground 3: Procedural Fairness, Publicity, Consultation and the EIA Gateway

Status in Version 4.0	**STANDS - AND HAS BECOME THE PIVOTAL GROUND. The screening direction of 26 August 2026 has closed the only statutory gateway to a guaranteed representation period, guaranteed site notices and consultation of the wider Schedule 4 statutory consultees. None of the bodies best placed to assess the principal constraints has any guaranteed entitlement to be consulted, and none has provided a substantive position.**
Assessed at	Section 6.6 below, and Section 16.6

6.1 Why this ground has been rewritten

6.1.1 PPC's earlier draft proceeded on the understanding that SI 2025/411 guarantees a minimum 21-day representation period. Verification against the Order establishes that this is not correct, and that the correct position is materially more serious. PPC sets it out fully, because it bears directly on whether the process by which this application is determined will be fair.

6.2 What SI 2025/411 actually requires

6.2.1 Publicity of the application (article 9).

As soon as practicable after giving notice under section 293B(5) agreeing to determine the application, the Secretary of State must publish the application and its accompanying documents on a website, and must notify the relevant local planning authority and the local planning register authority of the fact and location of publication. The register authority must then place the documents on the planning register. On request, the Secretary of State must supply details of the website and of where documents may be physically inspected. Article 12 disapplies these requirements in relation to any information the subject of a sensitive-information direction under section 293B(11).

6.2.2 Representations by the public (article 10) - permissive only.

Article 10(1) provides that the Secretary of State **may** publish an address for representations and the period within which they must be made. Article 10(2) provides that the Secretary of State **may** take such other steps as considered appropriate to bring that information to the attention of those who may have an interest. Article 10(3) provides that **if** such a period has been published, the Secretary of State must not determine the application before it ends, must take into account representations received within it, and may disregard those received afterwards.

6.2.3 There is therefore, for a non-EIA urgent Crown development application:

- **no obligation to invite public representations at all**;
- **no minimum representation period**;
- **no requirement for a site notice**;
- **no requirement for newspaper publicity**;
- **no requirement to notify adjoining owners or occupiers**.

6.2.4 Consultation of prescribed bodies (article 13).

Before determining the application the Secretary of State must consult "such of" seven named bodies "whose interests the Secretary of State considers would be affected": Natural England; the Environment Agency; National Highways Limited; the Coal Authority; the Historic Buildings and Monuments Commission for England (Historic England); local highway authorities; and the Health and Safety Executive. The Secretary of State must notify each consultee of the website and of the representation period and address, must not determine before that period ends (article 13(2)(b)), but **may determine earlier** if a "substantive response" within the meaning of article 16 has been received from each consultee (article 13(3)). Under article 16 a "substantive response" includes a statement that the consultee **has no comment to make**, or is content on the basis of the information available, or a reference to standing advice.

6.2.5 PPC draws attention to the consequence. Because a bare "no comment" qualifies as a substantive response, a set of holding responses from the seven prescribed bodies could, in principle, release the Secretary of State to determine the application before any published representation period has expired. That is a significant procedural vulnerability, and PPC asks that the Secretary of State expressly undertake not to exercise the article 13(3) power in this case.

6.2.6 Bodies not on the article 13 list.

The article 13 list does **not** include: the relevant sewerage undertaker (Thames Water); the water undertaker; the NHS Integrated Care Board; the police, fire or ambulance services; the local education authority; the lead local flood authority; the local planning authority's environmental health function; the Office for Health Improvement and Disparities; or any safeguarding body. Several of those bodies **are** included in the Table in Schedule 4 to the Town and Country Planning (Development Management Procedure) (England) Order 2015 for particular categories of development - but under SI 2025/411 the Schedule 4 consultees are engaged **only where the application is an EIA application** (article 14(1)(b)). It is noted that the Secretary of State had opened the wider consultation out to the wider public response does not need to be considered.

6.2.7 Consultation of the local planning authority (article 15).

The Secretary of State must notify the relevant local planning authority of a period for representations and an address. There is **no minimum period specified**. Article 15(3) permits determination before that period expires once a substantive response has been received. Article 20 requires the authority to forward to the Secretary of State any representations it receives.

6.2.8 The EIA gateway (articles 11, 14 and 17).

If, and only if, the application is an **EIA application** - that is, an application in respect of EIA development accompanied by an environmental statement - the following mandatory protections apply:

Requirement	Provision	Effect
Publication of required information within 5 working days	art. 11(2)(b)	Location, description, inspection details, address for representations
Representation deadline not before the last day of a 30-day period	art. 11(3)(c)	**A guaranteed 30-day public representation period**
Site display for not less than 30 days, or service on each adjoining owner or occupier, within 5 working days	art. 11(4)	**Guaranteed local notification**
Consultation of the Schedule 4 DMPO 2015 consultees	art. 14(1)(b)	**Engages the wider statutory consultee list**
No determination until at least 30 days after the application is sent to each such consultee	art. 14(2)(b)	Guaranteed consultee period; note art. 13(3) does **not** apply
No determination within 30 days of website publication or first site display	art. 17	**Guaranteed minimum determination period**

6.2.9 The conclusion is stark and, PPC submits, decisive of how this application ought to be handled. **For an urgent Crown development application, EIA status is not merely an environmental assessment question. It is the sole statutory source of guaranteed publicity, guaranteed consultation of the wider statutory consultees, and a guaranteed minimum period before determination.** If this application is not screened as EIA development, the community, the parish councils, the water and sewerage undertaker, the Integrated Care Board and the emergency services have no guaranteed statutory entitlement to be consulted or heard at all.

6.3 The common law duty of fairness

6.3.1 Where a statutory procedure is silent or permissive, the common law supplies the requirements of fairness. Where a public authority does embark upon consultation, whether or not obliged to, the consultation must be carried out properly: the *Gunning* criteria, endorsed by the Supreme Court in *R (Moseley) v Haringey London Borough Council* [2014] UKSC 56, require that consultation be undertaken at a formative stage; that sufficient reasons be given for the proposal to permit intelligent consideration and response; that adequate time be given for consideration and response; and that the product of consultation be conscientiously taken into account.

6.3.2 PPC submits that those criteria are engaged here and are not presently satisfied, for the following reasons:

(a) Formative stage.

The application has been made and certified before completion of the Applicant's own feasibility assessments, and before publication of the technical evidence base. Consultation on an application whose supporting technical evidence has not been published is not consultation at a formative stage in any meaningful sense.

(b) Sufficient reasons.

As matters stand, the published material comprises a factsheet and a ministerial statement. There is no published capacity figure for the Site. There is no published Transport Assessment, Environmental Statement, drainage strategy, ecological survey, land quality assessment or Landscape and Visual Impact Assessment. It is not possible to give intelligent consideration to a proposal whose scale is not stated and whose effects have not been assessed.

(c) Adequate time.

No representation period has been published. PPC has prepared this representation protectively, at speed, precisely because it cannot assume one will be.

- **Conscientious consideration.**
- Article 10(3)(b) and article 15(4) require representations received within any published period to be taken into account. Article 19 requires publication of the representations received. PPC will rely on those provisions.

6.4 The engagement that has not taken place

6.4.1 Cherwell District Council has publicly recorded that no engagement or consultation took place with the district, in any capacity, in advance of the announcement, and that full details have not been provided.

6.4.2 That is significant against the background of PPG Paragraph 044 (Reference ID 44-044-20250512), which records that pre-application engagement offers significant potential to improve both the efficiency and effectiveness of the application and decision-making process, and that such engagement may include engagement with the local planning authority, statutory and non-statutory consultees, local communities, and other government departments and agencies whose interests may be affected. PPG Paragraph 050 records that under the standard route the applicant is *strongly encouraged* to engage with the relevant local planning authority at pre-application stage unless doing so would compromise national security. No national security constraint has been identified here.

6.4.3 It is also significant against the background of the National Audit Office's findings on the Home Office's engagement practice in relation to large sites, and of the Home Affairs Committee's report *The Home Office's management of asylum accommodation* (HC 580, 2025), which found that the Government's approach to the delivery of asylum accommodation has led to accommodation being distributed unevenly, putting pressure on local services and creating or exacerbating community tensions, and which recorded scepticism about the delivery of the Home Office's plans for fairer distribution. The Local Government Association's published position, issued on 26 June 2026 in direct response to this announcement, is that the Home Office must engage with and obtain the consent of councils well in advance of any decisions to open, expand or close asylum accommodation.

6.4.4 PPC does not invite the Secretary of State to make findings about the Applicant's motives. It invites the Secretary of State to satisfy herself, on evidence, that meaningful good-faith engagement has taken place, and to record in the decision what engagement occurred and when.

6.5 Specific procedural relief sought

6.5.1 PPC requests that the Secretary of State, in the exercise of the powers and discretions conferred by SI 2025/411 and by the general law:

- **Screen the application as EIA development** (see Section 15), thereby engaging articles 11, 14 and 17 and the Schedule 4 consultee list.
- **In any event, publish under article 10(1) a representation period of not less than 30 days**, commencing only after all application documents (including the Statement of National Importance and Urgency, the statement of planning acceptability, and all technical assessments) have been published in full.
- **Undertake not to exercise the powers in articles 13(3) and 15(3)** to determine the application before the expiry of that period.
- **Require the local planning authority to display site notices** and to notify adjoining owners and occupiers, as it would be obliged to do were the application an EIA application.
- **Appoint an independent technical advisor** pursuant to PPG Paragraph 062 (Reference ID 44-062-20250512), which expressly contemplates that the Secretary of State may consult a technical, independent advisor to support the decision-making process, with the matters on which advice is sought varying from case to case. PPC submits that the wastewater capacity, highway safety and ecological baseline issues identified in this representation are precisely the kind of technical matters on which independent advice would assist.
- **Exercise the power recognised at PPG Paragraph 057** (Reference ID 44-057-20250512) - that where there is insufficient information to enable an informed planning judgement the Crown Casework Team may request further information from the applicant - in respect of each of the evidential deficiencies identified in this representation and listed at Appendix F.
- **Confirm** whether any direction under section 293B(11) has been sought or made, and if so the categories of information affected.
- **Publish, under article 19, all written representations received**, together with a reasoned decision addressing the principal important controversial issues identified in this representation.

6.5.2 PPC records that each of these requests is capable of being granted without any amendment to the statutory scheme, and that granting them would materially reduce the risk of a decision being taken on an inadequate evidential base.

6.6 The position following publication of the application documents

What the application confirms

6.6.1 On 26 August 2026 the Secretary of State directed that the proposal, although Schedule 2 development falling within paragraph 10(b), "is not likely to have significant effects on the environment" and is therefore "not 'EIA development' within the meaning of the 2017 Regulations". The direction letter contains no reasoning of its own; it refers to "the attached written statement which gives the reasons for direction as required by 5(5) of the EIA Regulations". The decision "was made by officials on behalf of the Secretary of State".

6.6.2 The consequence is the one identified at 6.2.9. Because the application is not an EIA application, articles 11, 14 and 17 of SI 2025/411 are not engaged. There is therefore no guaranteed 30-day public representation period, no guaranteed site display or service on adjoining owners and occupiers, no engagement of the Schedule 4 consultee list, and no guaranteed minimum period before determination.

6.6.3 The practical effect is now demonstrable rather than theoretical. PPC has reviewed every submitted document and has been unable to identify a substantive position on capacity or acceptability from **any** of the following: Oxfordshire County Council as local highway authority; Oxfordshire County Council as lead local flood authority and SuDS Approving Body; Thames Water as sewerage undertaker; Thames Water as water undertaker; the Environment Agency; Oxfordshire Fire and Rescue Service; NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board; Thames Valley Police; South Central Ambulance Service NHS Foundation Trust; the waste collection and disposal authorities; or the Historic Railways Estate.

6.6.4 As to the fairness criteria at 6.3.2, PPC records that limb (b), sufficient reasons, is now partly satisfied: technical documents have been published and PPC has been able to give them intelligent consideration. It records that limb (a), the formative stage, is not: the analysis at Section 5A establishes that the procedural route was fixed within seven days of submission and forty-four days before the screening question was decided, and that the Applicant's own consultants attribute the absence of scoping with the highway authority to the choice of route. And it records that limb (c), adequate time, remains unresolved, because no representation period has been published.

What assists the Applicant

6.6.5 A formal screening direction has been made, accompanied by a written statement of reasons under regulation 5(5). That is a reasoned decision of a kind that can be tested, and it is a materially better position than the informal screening arrangements considered in the Wethersfield and Scampton litigation described at 5.6.1.

What remains outstanding, and further relief sought

6.6.6 PPC repeats the relief sought at 6.5.1 in full, and adds the following:

- That the written statement of reasons accompanying the screening direction be published in full and that interested parties be given an opportunity to comment on it before determination.
- That the Secretary of State reconsider the screening direction under regulation 5 of the 2017 Regulations, for the reasons developed at Section 16.6.
- That the Applicant explain the discrepancy identified at 5A.5.6 between the date borne by the Air Quality Screening Technical Note and the covering letter's statement that it was being finalised.

6.6.7 PPC records two further matters bearing on the fairness of the process, neither of which affects validity but both of which bear on whether interested parties have been properly directed. First, the Minister of State's letter of 13 July 2026 to the local Member of Parliament states that "An application has been made to the Planning Inspectorate under the Town and Country Planning Act 1990 (**Section 293D Applications**) and the Town and Country Planning (**Crown Development Applications) (Procedure and Written Representations) Order 2025**". That describes the standard route under SI 2025/409, not the urgent route under SI 2025/411, and identifies the wrong recipient. A Member of Parliament seeking to advise constituents on how and when to make representations would have been materially misdirected. Second, the Article 5 Compliance Statement is headed under SI 2025/411 but its operative text cites SI 2025/409, and asserts compliance without identifying the persons notified or the dates of service.

PART C - THE PLANNING MERITS

7. Ground 4: Conflict with the Statutory Development Plan and Locational Unsustainability

Status in Version 4.0	**STANDS AND IS MATERIALLY STRENGTHENED. The Planning Proposal Statement asserts at its paragraph 5.1 that there is no statutory requirement for the decision maker to consider compliance with the development plan, contrary to PPG Paragraph 051, and then recites ten engaged adopted policies without applying any of them. The Applicant's own material confirms every factual premise of PPC's locational case.**
Assessed at	Section 7.8 below

7.1 The statutory starting point

7.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where regard is to be had to the development plan, the determination must be made in accordance with the plan unless material considerations indicate otherwise. Section 70(2) of the 1990 Act requires regard to be had to the provisions of the development plan and to any other material considerations.

7.1.2 The proper approach is settled. The decision-maker must first identify the relevant development plan policies, construe them correctly as a matter of law (*Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13, [2012] PTSR 983, per Lord Reed at [17]–[19]), reach a conclusion on whether the proposal accords with the plan **read as a whole**, and only then weigh material considerations. The exercise is not a mechanical policy-by-policy scoring exercise, but nor may conflict with the plan be sidestepped by moving directly to a general balance.

7.1.3 Government guidance confirms that this applies to Crown Development applications in the ordinary way. PPC makes the point expressly because the practical pressures of an accelerated, centrally determined procedure create a real risk that the development plan's statutory primacy is acknowledged in form but under-weighted in fact.

7.2 The development plan for the Site

7.2.1 The statutory development plan comprises:

- the **Cherwell Local Plan 2011–2031 (Part 1)**, adopted 20 July 2015, incorporating Policy Bicester 13 as re-adopted on 19 December 2016;
- the **Cherwell Local Plan 2011–2031 (Part 1) Partial Review - Oxford's Unmet Housing Need**, adopted September 2020;
- the **saved policies of the Cherwell Local Plan 1996**;
- the **Oxfordshire Minerals and Waste Local Plan** (to the extent engaged); and
- any made neighbourhood development plan for the relevant parish.

7.2.2 PPC has not been able to confirm from published sources whether a made neighbourhood development plan applies to the Site, and does not assert that one does. Confirmation of the position is recorded as a research item at Appendix F. If a made plan applies, it forms part of the development plan by virtue of section 38(3) of the 2004 Act and must be given full statutory weight.

7.3 The emerging Cherwell Local Plan Review 2042

7.3.1 Cherwell District Council submitted the Cherwell Local Plan Review 2042 for examination on 31 July 2025. Inspectors J Ayres and D Hendley were appointed. The first week of hearing sessions took place between 17 and 20 February 2026, addressing matters identified in the Inspectors' initial letter of 10 October 2025, with further sessions anticipated. No Inspectors' report has been issued.

7.3.2 It follows that, applying paragraph 48 of the National Planning Policy Framework (December 2024), the emerging Plan attracts **limited weight**: it is at a relatively early stage of examination, and the extent of unresolved objections is not yet known.

7.3.3 PPC makes two points. First, and against its own interest, PPC does not contend that the emerging Plan supports its objection; PPC's case rests on the **adopted** Plan. Second, and correspondingly, the Applicant cannot rely on more permissive or growth-orientated provisions anticipated in the emerging Review, nor on the proposition that the adopted Plan should be given reduced weight because a review is underway. The existence of a review does not render an adopted plan out of date.

7.4 Policies of the adopted Plan engaged

7.4.1 PPC's earlier draft identified four policies. Verification of the adopted Plan indicates that a materially wider suite is engaged. The following are relied upon.

Policy	Short title	How engaged
PSD1	Presumption in Favour of Sustainable Development	The local expression of the national presumption. Requires assessment of the sustainability of the location as well as the scheme's merits. Directly engaged by the introduction of a population of this scale at a location detached from any settlement.
Villages 1	Village Categorisation	Establishes the settlement hierarchy. The Site lies outside, and does not adjoin, any settlement within the hierarchy.
BSC 2	Effective and Efficient Use of Land	Engaged by the previously developed character of the Site, and by the question whether the proposed density and layout represent an efficient use of it.
BSC 10–12	Open space, outdoor sport and recreation; local standards of provision; indoor sport, recreation and community facilities	Engaged by the recreational and community facility needs of a resident population of this size at a location without such provision.
SLE 4	Improved Transport and Connections	Requires development to be supported by safe and suitable access for all modes and by genuine transport choice. Central to Section 8.
ESD 1	Mitigating and Adapting to Climate Change	Engaged by the location's transport dependency and by climate resilience (Section 13).
ESD 6	Sustainable Flood Risk Management	Engaged by the Site's position within the River Ray catchment and by the surface water consequences of intensified use (Section 13).
ESD 7	Sustainable Drainage Systems	Engaged by the surface water drainage strategy, which has not been published.
ESD 8	Water Resources	Engaged by potable water demand from a facility with communal laundry and catering, in a water-stressed region.
ESD 10	Protection and Enhancement of Biodiversity and the Natural Environment	Central to Section 10.
ESD 13	Local Landscape Protection and Enhancement	Central to Section 12.
ESD 15	The Character of the Built and Historic Environment	Engaged by built form, lighting, security infrastructure and heritage setting (Section 12).
ESD 17	Green Infrastructure	Engaged by the Site's position within the Otmoor, Bernwood and Ray focus area of Cherwell's Green and Blue Infrastructure Strategy (Section 10).
INF 1	Infrastructure	Requires development to be supported by the necessary infrastructure. Central to Section 9.
C15 (saved, CLP 1996)	Prevention of Coalescence of Settlements	Engaged by the Site's position in the gap between Piddington, Upper Arncott and Ambrosden.

7.4.2 PPC will provide, as a supplementary annex, a policy-by-policy compliance matrix in the form described at Appendix B, cross-referencing each policy to the Applicant's stated position once published, PPC's assessment, the supporting evidence and its evidential status.

7.5 National policy: the Framework in force and the Framework to come

7.5.1 The Framework in force. The National Planning Policy Framework of December 2024 remains the Framework in force as at the date of this representation. Applications fall to be decided against it.

7.5.2 The following provisions are of central relevance:

- **Paragraph 11** - the presumption in favour of sustainable development. PPC addresses this at 7.6 below.
- **Chapter 8 (paragraphs 96–108)** - promoting healthy and safe communities. Planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles. Paragraph 99 requires decisions to take into account, among other things, the likely future need for community facilities and services, and to guard against their unnecessary loss.
- **Chapter 9 (paragraphs 109–122)** - promoting sustainable transport. Significant development should be focused on locations which are or can be made sustainable, and appropriate opportunities to promote sustainable transport modes should be taken up given the type of development and its location. Paragraph 116 provides that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 115 requires, among other things, that safe and suitable access to the site can be achieved for all users.
- **Chapter 12** - achieving well-designed places, including paragraph 136 on the effect of lighting on intrinsically dark landscapes.
- **Chapter 14 (paragraphs 161–182)** - meeting the challenge of climate change, flooding and coastal change, including the sequential and exception tests.
- **Chapter 15 (paragraphs 187–201)** - conserving and enhancing the natural environment, including the protection and recovery of priority habitats and species, the intrinsic character and beauty of the countryside, and the limitation of the impact of light pollution.
- **Chapter 16** - conserving and enhancing the historic environment.

7.5.3 The Framework to come. A wholly restructured draft Framework was published for consultation on 16 December 2025. The consultation closed on 10 March 2026. The Government has indicated publication in summer 2026. The draft is not adopted policy and, as an unadopted consultation draft, attracts at most limited weight as a material consideration.

7.5.4 PPC raises this for a specific procedural reason. If the revised Framework is published between the date of this representation and the date of determination, it will constitute a **new material consideration of considerable importance**, and one which restructures the presumption in favour of sustainable development and the treatment of development inside and outside settlement boundaries. Fairness would require that interested parties be given an opportunity to make further representations on its application to this proposal. PPC requests that the Secretary of State undertake to give such an opportunity, and PPC reserves its position accordingly. PPC further notes the Planning and Infrastructure Act 2025, which received Royal Assent on 18 December 2025, and the new plan-making system which came into force on 25 March 2026, as part of the same shifting policy landscape.

7.6 Paragraph 11 and the "tilted balance"

7.6.1 PPC anticipates that reliance may be placed on paragraph 11(d) of the Framework. PPC's submissions are as follows.

7.6.2 The order of analysis is fixed. Section 38(6) requires the decision-maker first to determine whether the proposal accords with the development plan read as a whole. Only then do material considerations, including the Framework, fall to be weighed. The presumption in paragraph 11 is a material consideration; it is not a substitute for the statutory duty.

7.6.3 Paragraph 11(d) is engaged only in defined circumstances.

It applies where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date. The correct approach to "out of date" is that established in *Suffolk Coastal District Council v Hopkins Homes Ltd* [2017] UKSC 37, [2017] 1 WLR 1865: paragraph 11(d) is a policy statement, not a statutory provision, and its application does not displace the primacy of the development plan under section 38(6). Lord Carnwath's guidance that the framework's provisions are not to be interpreted as if they were statutory text, and that the weight to be given to policies is a matter for the decision-maker, applies with full force.

7.6.4 The policies most important for determining this application are not out of date.

The policies identified at 7.4.1 concern settlement strategy, transport, infrastructure, biodiversity, landscape, drainage and design. They are consistent in substance with the corresponding chapters of the December 2024 Framework. The adopted Plan's housing policies are not the policies most important for determining an application for accommodation which is not housing and does not meet local housing need.

7.6.5 Even if engaged, paragraph 11(d)(ii) requires a weighted balance.

Where the tilted balance applies, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. PPC's case at Section 18 is that they would. PPC further notes that paragraph 11(d)(i) disapplies the tilted balance where the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development; whether that limb is engaged will depend on the ecological and heritage evidence which has not yet been produced.

7.7 Why the location is unsustainable in principle

7.7.1 Stripped of policy citation, PPC's case under this ground is simple.

7.7.2 The Site has no meaningful public transport service of its own. It is not within safe or convenient walking or cycling distance of Bicester's shops, healthcare facilities, places of worship, leisure facilities, employment or public services. Its nearest neighbouring settlements are small rural villages with minimal services. It is not within, and does not adjoin, any settlement within the adopted settlement hierarchy.

7.7.3 The Applicant's answer is that the Site will be self-sufficient. That answer, however, is the problem rather than the solution, and it was so identified by the Inspector in 2003. A facility that must be engineered to be self-sufficient - providing its own healthcare, catering, laundry, waste treatment and activities - because its host location cannot sustainably support it, is by definition a poorly located development in conventional planning terms.

7.7.4 Two consequences follow, and both are material.

(a) The proposition that self-sufficiency neutralises impact is untested and, on the evidence, doubtful.

The Home Office's own evidence to a parliamentary committee in 2002 was to the same effect, and the Inspector nonetheless concluded that demands on some local services might well be disproportionately high. Independent inspection of comparable contemporary sites has recorded significant interface with local services notwithstanding on-site provision. Self-sufficiency is a design intention; its achievement is an empirical question requiring evidence.

(b) A wholly self-contained institutional enclave in the open countryside is difficult to reconcile with Chapter 8 of the Framework.

Chapter 8 seeks places that promote social interaction and are safe and accessible. PPC does not advance this point as a criticism of the prospective occupants. It advances it as a planning proposition: the deliberate creation of a large, physically separated, fenced and gated residential population with sign-in and sign-out control at a single rural access point is the antithesis of the integrated, accessible, mixed community that national policy seeks. That is a matter which weighs against the location, and it weighs on behalf of the prospective occupants as much as on behalf of the existing community.

7.7.5 PPC notes the contrast with the treatment of comparable population growth elsewhere in the district. Cherwell's adopted and emerging plans and its Infrastructure Delivery Plan direct large-scale growth - the North West Bicester allocation, Graven Hill, South West Bicester and the wider Bicester strategy - to locations immediately adjoining the town, served by new and upgraded highway infrastructure, public transport measures, active travel connections and phased delivery of schools, healthcare and community facilities funded through the Community Infrastructure Levy and section 106 obligations. That approach is not incidental. It reflects the plan-making conclusion that growth of this magnitude can be sustainably accommodated only where such infrastructure is planned and funded in tandem with the development. Site A has none of those characteristics and appears in no infrastructure planning document as a growth location.

7.8 The position following publication of the application documents

The Applicant's stated position on the development plan

7.8.1 Paragraph 5.1 of the Planning Proposal Statement states: "This section sets out the legislative and planning policy context relevant to the Bicester scheme. **There is no statutory requirement for the decision maker to consider compliance with the development plan.** Each decision will be made after consideration of the planning merits of the case".

7.8.2 That statement is contrary to the Government's own published guidance. Planning Practice Guidance Paragraph 051 (Reference ID 44-051-20250512) states that "an application under the Crown Development route will be determined in accordance with the development plan unless material considerations indicate otherwise". That is the formulation of section 38(6) of the Planning and Compulsory Purchase Act 2004, and it is the position PPC states at 2.4.4 and 7.1.3.

7.8.3 PPC invites the Secretary of State to correct that statement expressly, and to record in the decision, as part of the reasons required by article 18(2), that the application has been determined in accordance with the development plan unless material considerations indicated otherwise.

7.8.4 The consequence is substantive, not presentational. Section 5 of the Planning Proposal Statement recites the adopted policies at length. Sections 6 and 7 then assess the proposal against eight self-selected "Assessment Criteria" rather than against the policies. The result is that engaged policies are recited and never applied. PPC identifies the following.

Policy	Requirement	Treatment in the submitted material
Villages 1	Village categorisation and the settlement hierarchy	Not mentioned anywhere in the Planning Proposal Statement. The Site lies outside, and does not adjoin, any settlement in the hierarchy
TR7 (saved, CLP 1996)	"Development that would regularly attract large commercial vehicles or large numbers of cars onto unsuitable minor roads will not normally be permitted"	Recited at paragraph 5.23; never applied to the daily service vehicle movements, the coach and minibus movements, or the foul effluent tankering proposed for Phase 1
TR10 (saved, CLP 1996)	"Development that would generate frequent heavy-goods-vehicle movements… on unsuitable urban or rural roads will not be permitted"	Recited at paragraph 5.24; never applied
C15 (saved, CLP 1996)	Prevention of coalescence of settlements	Asserted compliant at paragraph 7.31 without any assessment of perceived separation between Piddington, Upper Arncott and Ambrosden
ESD 3	Water efficiency limit of 110 litres per person per day; BREEAM "Very Good" for non-residential development; demonstration through an Energy Statement	Recited at paragraphs 5.48 to 5.50. **Contradicted** by the Drainage Design Statement, which assumes 140 litres per person per day. No BREEAM assessment and no Energy Statement submitted
ESD 4	Feasibility assessment for district heating and combined heat and power required for all non-domestic development above 1,000 sqm	Recited at paragraphs 5.53 to 5.55; deferred to pre-commencement condition, although the policy requires it to accompany the application. The proposal is for 17,935 sqm
ESD 5	Feasibility assessment for on-site renewable energy required for the same class of development	Recited at paragraphs 5.56 to 5.59; likewise deferred to pre-commencement condition
ESD 7	"SUDS will require the approval of Oxfordshire County Council as LLFA and SUDS Approval Body, and proposals must include an agreement on the future management, maintenance and replacement of the SUDS features"	Recited at paragraph 5.65. No LLFA approval sought, no engagement undertaken, no management and maintenance agreement submitted
ESD 8	Development permitted only where adequate water resources exist or can be provided without detriment to existing uses	Recited at paragraphs 5.66 to 5.67. No water supply capacity confirmation; the Applicant's own consultant describes the site network as "of limited capacity relative to any concentrated development"
ESD 11	Where development is within or adjacent to a Conservation Target Area, biodiversity surveys and a report are required to identify constraints and opportunities	Recited at paragraph 5.69, and the Site is confirmed at paragraph 2.13 to be "immediately adjacent to a 'Conservation Target Area'". The only survey is a single-visit preliminary appraisal with nine outstanding survey requirements
INF 1	"Development proposals will be required to demonstrate that infrastructure requirements can be met"	Recited at paragraph 5.83. No capacity confirmation obtained from any provider of water, foul drainage, electricity, healthcare, education, emergency services or waste

What the application confirms on locational sustainability

7.8.5 The factual premises of PPC's case at 7.7.2 are now confirmed by the Applicant's own material:

- "There is currently **no pedestrian infrastructure** provided along this section of the B4011, making both accesses inaccessible by foot" (Planning Proposal Statement, paragraph 2.5).
- The nearest bus stops are not reachable on foot "due to the B0411 having no pedestrian path" (paragraph 2.8).
- "There is **no existing cycle infrastructure** within the vicinity of the site along the B4011" (paragraph 2.7).
- "There are **very limited facilities** in the immediate vicinity of the Site, reflecting its rural location and lack of direct pedestrian connectivity to nearby settlements. **However, this is not considered to be a material constraint because the proposed development is intended to operate as a self-contained site**" (paragraph 2.10).
- "It is acknowledged that from the point of view of accessibility by sustainable travel modes **the location of the site is not ideal**" (Transport Assessment, paragraph 8.1.7).

7.8.6 Paragraph 2.10 is, in PPC's submission, the point on which this ground turns. It is an acknowledgement that the location cannot support the development, coupled with an assertion that this does not matter because the development will not use the location. That is precisely the reasoning the Inspector rejected in 2003 and which PPC anticipated at 7.7.3. It is not an answer to Policy Villages 1, to Policy SLE 4, to Policy ESD 1, or to Chapters 8 and 9 of the Framework.

What assists the Applicant

7.8.7 PPC records three matters in the Applicant's favour. First, the previously developed character of the Site is confirmed and is entitled to the weight PPC acknowledged at 2.1.3 and 2.1.4. Second, the Applicant is entitled to rely on the planning history as a material consideration, and does so at paragraphs 6.4 and 6.9 of the Planning Proposal Statement. Third, the Applicant is right that the 2003 decision-maker concluded that a sequential test and alternative site analysis were not required in those circumstances.

7.8.8 PPC's response to that reliance is in four parts, and it states the position with candour.

- PPC accepts, as it did at 3.4.2, that Cherwell District Council's challenge to the 2003 decision failed on every ground, including on the relevance of alternative sites and on the sequential approach.
- But the Applicant relies on the 2003 **decision**, and not on the Inspector's report which preceded it. The Inspector, after a fourteen-day inquiry, recommended that approval should not be given, for the three reasons at 3.3.1. The Applicant's own summary at paragraph 2.16 records the First Secretary of State's contrary conclusion and not the Inspector's recommendation.
- The 2003 permission was for **750 persons** on an application site the Applicant states to have measured 10.2 hectares. This application is for **1,256 persons** on 10.22 hectares: an increase of approximately 67 per cent in population on effectively the same land area, with a 3,105 sqm wastewater treatment works and a 359 sqm pumping station in addition.

- The 2003 permission was never implemented. Its reserved matters were objected to by the local planning authority on design, lighting and highway safety grounds, were never determined, and were withdrawn. The programme was cancelled in June 2005 after approximately £28 million had been spent. That is the outcome now relied upon as establishing the principle of development.

What remains outstanding

7.8.9 A policy-by-policy statement of compliance against the adopted development plan, addressing at minimum the eleven policies tabulated at 7.8.4; express correction of the statement at paragraph 5.1 of the Planning Proposal Statement; and confirmation whether a made neighbourhood development plan applies to the Site (7.2.2).

8. Ground 5: Highway Safety, Access and Active Travel

Status in Version 4.0	**STANDS; NARROWED IN ONE PARTICULAR. A Transport Assessment has been submitted and, as PPC requested, derives trip generation from observed data at a comparable operational site rather than from generic rates. Six of the eight tests at 8.3.3 are not met. No scoping took place with the highway authority; no off-site mitigation is proposed; and the pedestrian movements of up to 1,256 residents who are "free to come and go" are addressed by a recommendation that they use minibuses.**
Assessed at	Section 8.6 below

8.1 The access corridor

8.1.1 Vehicular access to Site A is taken from the B4011. Pedestrian movement towards Piddington is along Widnell Lane, and towards the nearest shop and other services at Upper Arncott is along Palmer Avenue. All three routes are rural in character: for substantial stretches they are unlit, without continuous footway provision, and subject to the national speed limit outside village envelopes. PPC notes that the section of the B4011 immediately adjacent to the site access is in fact signed at 50 mph rather than the 60 mph national speed limit applicable to a single carriageway road, and that recorded traffic speeds on that stretch exceed even that lower, posted limit (see 8.6.6).

8.1.2 PPC has requested the STATS19 personal injury collision record for the B4011 and Widnell Lane corridor for the most recent available five-year period from Oxfordshire County Council as highway authority. PPC records the request at Appendix F as a high-priority evidence item.

8.1.2A For completeness, PPC notes that the wider Wrong Plan Wrong Site working group has compiled collision figures for the B4011 corridor from a public mapping tool: for the five-mile section, 78 casualties and 53 injury collisions between 2012 and 2024 (2 fatal, 13 serious, 38 slight), of which 31 occurred within approximately 1.5 miles of the site entrance. PPC does not adopt these figures as fact in this representation. They are drawn from a general web mapping source, not the primary STATS19 record, and PPC will rely on them only once the highway authority has confirmed the underlying data. PPC includes them here solely to indicate the order of magnitude that the requested primary data is expected to address. Separately, and from a source that can be cited directly, a five-year-old boy, Teddy Hickman, died in a collision on the B4011 at Blackthorn on 14 April 2024, approximately two miles from the site (BBC News, 15 April 2024).

8.1.3 A legally binding Routeing Agreement dated 19 January 2010 is registered against title ON255160. It arose from the 2008–2010 removal centre scheme and restricts heavy commercial vehicle movements to and from the land. That agreement is a material consideration. It is evidence that the highway authority previously judged HGV movement on this corridor to require formal control, and the Applicant must confirm whether it still binds the land now proposed and how the proposed use would comply with it.

8.1.4 PPC makes clear that the removal of that assertion does not weaken this ground, for the reason set out immediately below.

8.2 The 2003 finding on pedestrian safety at this location

8.2.1 The Inspector who examined a materially similar proposal at this landholding identified, as **one of only three reasons** for recommending refusal, that the risk of road accidents involving pedestrian asylum seekers and others was a very real, practical worry to which the Home Office had given insufficient attention. That finding was made on the evidence of a fourteen-day inquiry at which Oxfordshire County Council as highway authority participated.

8.2.2 PPC submits that this is the single most significant piece of evidence on this ground, and that it has three consequences.

(a) The concern is not speculative.

It has been examined, tested at inquiry and upheld by an independent Inspector in relation to this location and this category of development.

(b) The proposal now before the Secretary of State is materially larger.

The 2002–03 proposal was for 750 persons. The present proposal is understood to be in the order of 1,200 to 1,250.

(c) The evidential burden on the Applicant is correspondingly higher.

Where an independent Inspector has previously found a specific highway safety risk at this location to have been given insufficient attention, an applicant returning to the same location with a larger scheme must address that finding directly. A generic trip-generation assessment will not do so.

8.3 The scale and character of additional movements

The EIA Screening Report submitted with the application provides the following data on anticipated movements associated with the Site. This section (8.3) is retained as drafted before the Transport Assessment was published, since it forms part of PPC's original grounds of objection; PPC's assessment of the Transport Assessment against the matters raised here, and its account of the EIA Screening Report data reproduced below, both appear at 8.6.

> *"Site staff commuting is estimated in three shift patterns and two of which overlap, totalling 260 vehicle movements in any 24-hour period. Service vehicle movements are estimated as 192 per day (including 43 Light Goods Vehicle and 53 Heavy Goods Vehicles in two-way trips). Minibus SU arrivals are estimated as 2 vehicles per day. Taxi SU departure will be starting after the first period of SU occupancy has expired from the site opening (occupancy likely set at 90 days), which will be up to 30 individual trips per day. Number of shuttlebus transport for SUs to use off-site facilities have not been estimated, but will include longer and shorter trips for SUs depending on which facilities are to be accessed."*

8.3.1 A facility accommodating in the order of 1,200 to 1,250 residents, together with staff, contractors, security personnel, catering and laundry deliveries, medical and welfare visits, waste collection and transport of residents to appointments, will generate a substantial increase in movements on this corridor.

8.3.2 The character of those movements requires specific attention, and standard trip-generation databases are unlikely to be an adequate proxy. In particular:

- The Applicant's stated model is self-sufficiency, which implies **regular heavy goods deliveries** of food, laundry, and supplies to a single access point on a rural B-road.
- A facility with 24/7 on-site security implies **shift-change patterns**, concentrating staff movements at hours which may not coincide with conventional peaks and which may fall in darkness.
- The factsheet indicates that occupants would normally be accommodated during the **initial processing stage** of their claims, which implies **significant population turnover** and therefore a recurring pattern of coach or minibus movements.
- Sign-in and sign-out control at the front gate implies that all pedestrian movements to and from the Site are funnelled through **a single point on the B4011**. The application documents subsequently identify this access as the northern site access; see 8.6.9 as to an unresolved inconsistency in the application material about which access serves which function.

8.3.3 PPC therefore requests that any Transport Assessment, once published, be scrutinised with particular reference to whether it:

- is based on observed data from a comparable operational site, rather than generic trip rates for an ill-fitting land use class;
- addresses HGV and coach movements separately, including swept-path analysis at the site access and at constrained points on the B4011 and Widnell Lane;
- models night-time and shift-change movements;
- engages directly with the STATS19 collision record;
- assesses pedestrian and cycle desire lines from the Site to Piddington, Upper Arncott, Ambrosden, Blackthorn and Bicester, and the safety of those routes in darkness and in winter conditions;
- assesses the adequacy of public transport provision and the deliverability and funding of any proposed enhancement over the full intended operational life;
- assesses the cumulative effect with other committed development in the Bicester area; and
- has been agreed with Oxfordshire County Council as local highway authority.

8.4 Active travel and the welfare of occupants

8.4.1 PPC raises pedestrian safety not only in respect of existing residents - who use these roads for walking, cycling and horse-riding - but expressly in respect of the future occupants of the Site.

8.4.1A The corridor also serves an existing community facility. Bicester Garrison Sports Ground, in current active use by Launton FC, lies directly across the B4011 from Site A. It is used by children and families, many of whom arrive on foot or by bicycle and must cross the same road. Any assessment of pedestrian risk on this corridor must take account of these existing users, not only the movements the development would itself generate.

8.4.1B One of the more likely pedestrian journeys for occupants seeking to reach shops and other services on foot is from the Site to the nearest shop, at Upper Arncott. The most direct route for that journey is along Palmer Avenue, which is unlit, subject to the national speed limit, and has no footway for its length. PPC also raises the protection of the wider network of rights of way, footpaths and bridleways used by the existing community around the Site, including those crossing the fields around Blackthorn, Piddington, Upper Arncott and Ambrosden, which are remote and would be crossed by pedestrian movement the development would generate.

8.4.2 People accommodated at the Site may reasonably be expected to wish to walk to the nearest settlements for social contact, exercise, worship or to access services not provided on site. The factsheet's statement that the Site would be designed to reduce the need for occupants to leave it does not mean that they will not do so; they will not be detained, as the factsheet itself makes clear. Provision must therefore be made for the reality that a significant number of people will walk along an unlit, footway-less rural road subject to the national speed limit.

8.4.3 This is precisely the risk the 2003 Inspector identified. PPC submits that it cannot properly be addressed by a condition requiring a travel plan. It requires either physical infrastructure - continuous lit footway provision along the relevant lengths of the B4011 and Widnell Lane, with safe crossing points, for which no funding mechanism has been identified, or acceptance that the location is unsuitable.

8.5 Policy conclusion

8.5.1 The proposal engages paragraphs 108 to 122 of the Framework, and in particular the requirement at paragraph 115 that safe and suitable access to the site can be achieved for all users, and the test at paragraph 116. It engages Policy SLE 4 of the adopted Local Plan. It engages the design principles in *Manual for Streets*, the guidance in *Inclusive Mobility*, and the Department for Transport's Local Transport Note 1/20 on cycle infrastructure design so far as any active travel provision is proposed.

8.5.2 PPC submits that, absent a robust site-specific Transport Assessment which engages directly with the recorded collision history, models the specific movement patterns of this land use, and demonstrates that safe and suitable access can be achieved for **all** users including pedestrians, the proposal cannot properly be found to comply with those requirements.

8.6 The position following publication of the application documents

What assists the Applicant

8.6.1 PPC records two respects in which the Transport Assessment is better than Version 3.0 anticipated. First, trip generation is not derived from generic trip rates for an ill-fitting land use class. It is derived from seven days of automatic traffic count data collected at RAF Wethersfield from 16 April 2026, a site the assessment describes as "comparable to the proposal at Bicester". The first of the eight tests at 8.3.3 is therefore met, and PPC withdraws that criticism. Second, swept-path analysis has been carried out for a 16.5 metre articulated heavy goods vehicle, for a refuse vehicle and for a 15 metre coach at the site access, and visibility splays have been assessed.

8.6.2 PPC records one qualification which the assessment itself makes: "It should be noted that the staff shift times at RAF Wethersfield differ to the proposed development at Bicester."

Assessment against the eight tests at 8.3.3

8.6.3 PPC's position on each of the eight matters it asked to be scrutinised is as follows.

Matter requested at 8.3.3	Position
Observed data from a comparable operational site rather than generic trip rates	**Met**
HGV and coach movements addressed separately, with swept-path analysis at the site access and at constrained points on the B4011 and Widnell Lane	**Partly met.** Swept paths provided at the southern site access only. No analysis of constrained points on the B4011 or Widnell Lane. No assessment of foul effluent tanker movements for the Phase 1 cesspool. See 8.6.9 as to an unresolved inconsistency about which access, northern or southern, serves which category of traffic.
Night-time and shift-change movements modelled	**Not evident.** Weekday AM and PM peak periods only
Direct engagement with the STATS19 collision record	**Not met in a verifiable form.** Three collisions identified over "the most recent five year period available", the most recent in March 2023 in a report dated June 2026. The data source, exact search period and network extent are not stated. The network extent shown in the collision-search diagram also appears markedly smaller than the walking and cycle-catchment radii applied elsewhere in the assessment's own accessibility analysis; PPC requests that the two be reconciled (Appendix F, item F5.12).
Pedestrian and cycle desire lines to the surrounding settlements, and the safety of those routes in darkness and in winter	**Not met.** See 8.6.4 below. Widnell Lane is referred to only as forming the Site's southern boundary and is not assessed as a pedestrian route at all
Adequacy of public transport, and the deliverability and funding of any enhancement over the operational life	**Not met.** The nearest bus stops are at 736 m and 1.4 km and are acknowledged not to be reachable on foot
Cumulative effect with other committed development in the Bicester area	**Not evident.** Growth is applied through TEMPro factors; no committed development is separately modelled
Agreement with Oxfordshire County Council as local highway authority	**Not met, and expressly so** (paragraph 1.4.2)

The point on which this ground turns

8.6.4 The Transport Assessment confirms at paragraph 4.1.9 that "**Service Users will be free to come and go from the site**, and a log in / out system will be in operation for the safety of Service Users." It then addresses the consequence, at paragraph 3.4.4, in a single sentence: "given the absence of any pedestrian infrastructure serving the site, **it is recommended that Service Users access facilities in these areas by the minibuses that will be provided by the Home Office**."

8.6.5 That is a recommendation, not an assessment. The movements are not quantified, not modelled and not mitigated. No footway is proposed. No lighting is proposed. No crossing is proposed. No funding mechanism for any of those is identified, and the assessment concludes that "no off-site mitigation would be required".

8.6.5A The Applicant's EIA Screening Direction: Written Statement addresses the same risk in these terms: "Highway safety: The B4011 in the vicinity of the site is subject to a 50mph speed restriction and the site access and egress points lack safe / pavemented routes traverse. To enter or exit the site on foot would require considerable care and SUs will be strongly encouraged to only do so using the shuttle bus provision on safety grounds. To further emphasise the potential danger, high visibility vests will be provided to those leaving on foot and further discourage this mode." PPC submits that this response addresses the symptom rather than the hazard. On any recognised hierarchy of control measures, personal protective equipment and behavioural discouragement are the least effective response, to be used only once elimination, substitution and engineering controls have been exhausted; nothing in the Applicant's own material shows that those have been considered.

8.6.6 The Applicant's own baseline confirms the physical characteristics on which PPC relies. There is no footway at the northern access. The footway at the southern access is approximately 1.0 metre wide with no formal dropped kerbs or crossing facilities. Recorded 85th percentile speeds at the northern access are 53.6 mph northbound and 53.4 mph southbound, above the posted limit. The Planning Proposal Statement gives that limit as 60 mph at its paragraphs 2.7 and 2.11; the Transport Assessment gives it as 50 mph.

8.6.7 The finding on which this ground principally rests, that of the 2003 Inspector at paragraph 14.75 of his report, is not cited or engaged with anywhere in the submitted material. PPC repeats what it said at 8.4.3: this risk cannot properly be addressed by a condition requiring a travel plan. It requires either physical infrastructure or acceptance that the location is unsuitable. The Applicant has proposed neither.

8.6.8 Two further matters are recorded. Construction traffic is not assessed at all: "This level of detail is currently not available so for the proposed development it is not possible to make an accurate estimate of construction traffic generation." And the Travel Plan submitted with the application remains at Revision 2 in **draft** status, takes its baseline modal split from the 2011 Census "In the absence of existing travel data for the site", and expressly excludes the residents from its scope: "This TP therefore addresses staff and visitors only."

8.6.9 PPC also records an unresolved question as to which access has been assessed. The Transport Assessment states at paragraphs 3.2.6 and 3.2.7 that "The southern access point operates as the principal point of entry to the site and is the sole entrance in use. The northern entrance has not been used for a considerable period", and its swept-path work routes refuse vehicles and coaches through the southern access. The capacity assessment output is labelled "Northern Site Access". The Travel Plan states at paragraph 4.5.1 that "Service and emergency vehicles will gain access to the development via the improved northern site access off the B4011." PPC does not assert that the

wrong junction has been modelled; it asks that the Applicant confirm which access serves which category of traffic and provide capacity results for the access that will carry it.

What remains outstanding

8.6.10 The primary STATS19 record with its source, period and network extent stated; a quantified assessment of pedestrian movement by residents and of the safety of the routes used; swept-path analysis at constrained points on the B4011 and Widnell Lane; assessment of foul effluent tanker movements; a construction traffic assessment and an agreed Construction Traffic Management Plan; a full Travel Plan including residents, with targets, monitoring and an enforcement mechanism; confirmation of the status of the Routeing Agreement of 19 January 2010 registered against title ON255160, which the Transport Assessment does not mention; and the substantive response of Oxfordshire County Council as local highway authority.

9. Ground 6: Infrastructure Capacity

Status in Version 4.0	**STANDS AND IS VERY SUBSTANTIALLY STRENGTHENED. None of the nine matters at 9.2.13 is answered. Thames Water has never been asked whether it has capacity. Because capacity to treat cannot be established, the Applicant proposes a new wastewater treatment works on the Site discharging to an unidentified watercourse. The existing electrical infrastructure "cannot be relied upon". No health, police, fire or ambulance body has provided a position.**
Assessed at	Section 9.8 below, and Sections 15A.1 and 15A.2

9.1 The framework

9.1.1 Policy INF 1 of the adopted Local Plan requires development to be supported by the necessary infrastructure. Chapter 8 of the Framework requires planning decisions to take into account the need for community facilities and services. Paragraph 100 requires decisions to plan positively for the provision of shared spaces, community facilities and local services. The overarching proposition is uncontroversial: development of this scale should not be permitted without clear, site-specific evidence that the infrastructure required to support it has the capacity to absorb it without detriment to existing users and the receiving environment.

9.1.2 PPC is not aware that any such evidence has been published in respect of Site A. The evidence PPC has been able to gather points toward existing, unresolved constraints in precisely the areas that a development of this scale would place under the greatest additional strain.

9.2 Foul drainage and wastewater treatment: the central issue

9.2.1 PPC treats wastewater as the most acute infrastructure constraint, for three reasons: the receiving works is already the subject of recognised capacity and resilience issues; the delivery of the further investment required is now itself uncertain; and the receiving watercourses are of recognised ecological sensitivity.

The receiving works and its design horizon

9.2.2 Bicester Sewage Treatment Works discharges to the River Ray catchment. A growth upgrade scheme was implemented at Bicester STW following identification of the need in late 2019, responding to the requirement to provide treatment capacity for an increase in population equivalent **from 49,500 to 67,840 at a 2026 design horizon**. That upgrade was completed in 2022.

9.2.3 Two propositions follow, and PPC invites the Secretary of State to note both.

(a) The design horizon is now.

A works upgraded to serve a stated population equivalent at a 2026 design horizon has, by definition, no assured headroom beyond that horizon without further investment. The year of the design horizon is the present year.

(b) The upgrade was calibrated to planned growth, not to this proposal.

The population equivalent figure reflected Bicester's planned growth through the adopted Local Plan. Site A appears in no such plan. A population of the order proposed here, together with communal catering and laundry, was not within the design assumptions.

9.2.4 PPC further notes independent analysis, drawing on Thames Water's own published data, indicating that more than half of Thames Water's treatment works are operating without sufficient capacity to treat the volumes they receive, and that the total hours of discharge from works with inadequate capacity has increased substantially in recent years. PPC does not present that analysis as a determination by the regulator. It presents it as corroborative of the proposition that headroom cannot be assumed.

Groundwater infiltration in this specific catchment

9.2.5 PPC's review of Thames Water's published Drainage and Wastewater Management Plan material indicates that the Bicester catchment is served by a predominantly separate sewerage network; that there is a recognised link between rising river and groundwater levels and drainage problems experienced by customers, including sewer flooding and restriction of use of sanitary facilities; and that villages in the immediate vicinity of the Site are identified as particularly prone to groundwater infiltration, with infiltration identified as the most probable cause of occasions when the network and treatment works have been unable to cope with incoming flows, resulting in both household problems and environmental spills.

9.2.6 That is significant because it means the constraint is not merely one of consented dry weather flow. It is a wet-weather resilience constraint in a catchment with known infiltration problems, on Oxford Clay, adjacent to a river floodplain. A new foul load of the scale proposed must be assessed against wet-weather performance, not average performance.

The deliverability of further investment is now uncertain

9.2.7 This is a new and material consideration that did not feature in PPC's earlier draft, and PPC regards it as of considerable importance.

9.2.8 On 16 June 2026 the Secretary of State for Environment, Food and Rural Affairs made a statement to the House of Commons concerning Thames Water. She confirmed that she had written to the Chair of Ofwat setting out her early views on the creditor-led recapitalisation proposal by reference to her duties under section 2 of the Water Industry Act 1991, and stated that she did not believe the current proposal went far enough to protect customers and the environment. Her letter identified concerns including the cost to customers, delays to critical infrastructure investment, and the risk of further environmental deterioration, and warned that the proposal could prioritise asset health over capital improvements, reduce performance requirements and **defer a significant number of investments, in some cases for as long as a decade**, expressly identifying potential delays to **wastewater treatment** projects.

9.2.9 As at the date of this representation, no special administration order has been made, and Ofwat's decision on the recapitalisation proposal is awaited. PPC does not speculate as to the outcome. Its submission is narrower and, it submits, unanswerable in planning terms:

Where the mitigation on which a development depends consists of capital investment by a regulated undertaker whose investment programme is the subject of an unresolved regulatory and financial process, and where the responsible Secretary of State has warned Parliament that investments including wastewater treatment schemes may be deferred by up to a decade, the decision-maker cannot treat that investment as committed. Deliverability of mitigation is a material planning consideration, and unproven mitigation attracts little or no weight.

9.2.10 That proposition is of particular force where the intended operational life of the development is a minimum of ten years - the very period over which investment deferral has been identified as a risk.

The receiving environment

9.2.11 The Site lies within the River Ray catchment. The wider landscape includes the Arncott Bridge Meadows Site of Special Scientific Interest, an area of unimproved hay meadow adjacent to and within the floodplain of the River Ray, notified in 1985; the Wendlebury Meads SSSI; and the Otmoor SSSI. The Berks, Bucks and Oxon Wildlife Trust's Upper Ray Meadows reserve complex lies downstream. Cherwell District Council's own Green and Blue Infrastructure Strategy identifies the Otmoor, Bernwood and Ray focus area as an area of high natural capital value and one of the best remaining ecologically coherent large-scale landscapes in southern England, containing more designated sites than any comparable area in Oxfordshire.

9.2.12 Any increase in foul loading, storm spill frequency or duration in this catchment therefore requires assessment against a receiving environment of recognised sensitivity, and against the Environment Agency's water quality objectives for the relevant water bodies under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

What PPC asks for

9.2.13 PPC's conclusion is not that Site A cannot be connected to the Bicester network. PPC does not have the evidence to say that, and does not assert it. PPC's conclusion is that a **site-specific assessment is essential and has not been produced**. PPC calls on the Applicant and Thames Water to confirm, and the Secretary of State to publish, before determination:

- whether Site A would discharge to Bicester STW and, if so, the proposed connection point, and any pumping, rising main or network reinforcement required;
- the current actual dry weather flow, flow to full treatment and population equivalent loading at Bicester STW, compared against permitted and design capacity;
- the wet-weather and dry-weather headroom remaining once all committed development and planned connections are accounted for;
- the additional average and peak flows Site A would generate, stating the assumptions as to occupancy, communal kitchens, laundry facilities and any on-site healthcare;
- whether the Applicant proposes an on-site treatment solution and, if so, its consenting position with the Environment Agency, its receiving watercourse and its resilience;
- whether connection would increase sewer surcharge, property flooding risk or storm spill frequency or duration in advance of further growth works being completed;
- the programme and funding status of any further Bicester STW growth scheme, and the effect on that programme of the outstanding regulatory and financial process concerning Thames Water;
- Thames Water's formal position, in writing, as sewerage undertaker; and
- the Environment Agency's formal position on the effect on the receiving water bodies.

9.2.14 PPC notes that a sewerage undertaker's duty under section 94 of the Water Industry Act 1991, and the right of connection under section 106, do not answer these questions. A right to connect is not evidence of capacity to treat.

9.3 Water resources

9.3.1 Policy ESD 8 of the adopted Local Plan addresses water resources. The Thames Water supply area is a designated area of serious water stress. A facility of this scale with communal catering and laundry represents a material additional demand.

9.3.2 PPC requests confirmation of the assessed potable water demand, the supply point, any network reinforcement required, Thames Water's position as water undertaker, and the water efficiency standards to be applied. PPC also understands that the clean water network serving the Site is limited and may be a private supply requiring external reinforcement, and requests confirmation of the capacity available and of the impact on existing users and on planned local housing development if reinforcement is required.

9.4 Healthcare

9.4.1 The Applicant's published position is that "extensive efforts will be made to minimise the impact on local health services and provision will be determined in discussion with health partners". That is a statement of intention. It is not an assessment, and it does not identify the outcome of those discussions.

9.4.2 PPC's submission is that the outcome must be before the decision-maker. Specifically, PPC requests that NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board be formally consulted, and that its response be published, addressing:

- the proposed on-site primary care model, its commissioning basis, its staffing and its funding, and whether it is capable of meeting the full primary care needs of the resident population;
- the assessed additional demand on local general practice, dentistry, community pharmacy, mental health services and secondary care, including at the Horton General Hospital and the Oxford University Hospitals trust, and on out-of-hours and urgent care;
- the assessed additional demand on ambulance services;
- the workforce implications, including whether the recruitment of clinical staff to an on-site facility would draw from the same constrained local labour market as existing NHS and social care providers; and
- whether the ICB considers that the proposal can be accommodated without detriment to existing service users, and what if any mitigation or funding is required.

9.4.3 PPC records that the 2003 Inspector considered demands on social services and special educational needs provision might well be disproportionately high because some of those accommodated were likely to have had stressful or traumatic past experiences. That analysis is likely to apply with equal or greater force to mental health services in relation to the present proposal, and is supported by the evidence considered in *TG and others* (Section 16).

9.5 Policing, fire and ambulance

9.5.1 PPC requests confirmation from Thames Valley Police, Oxfordshire Fire and Rescue Service and South Central Ambulance Service NHS Foundation Trust of their assessed operational capacity to respond to a development of this scale at this location, and of any resourcing implications identified.

9.5.2 PPC raises three specific matters for those bodies:

(a) Response times to a rural location.

The Site is remote from the principal emergency service bases serving the district. Response times to a facility accommodating over a thousand people, with 24/7 occupancy, require assessment.

(b) Fire safety and evacuation.

A facility of this scale and occupancy, with communal accommodation and catering, engages fire safety considerations of a different order from those applicable to the previous storage use. The Health and Safety Executive is a prescribed consultee under article 13(1)(g) of SI 2025/411. Building Regulations approval and Fire and Rescue Service consultation must be addressed, together with the adequacy of the single access point for emergency vehicle access and for evacuation. A fire risk assessment under the Regulatory Reform (Fire Safety) Order 2005 will be required following inspection of the completed buildings, and will need to reflect the intended use of each block. PPC notes that the Fire Strategy as published indicates communal accommodation blocks without fire-separation between individual rooms, and requests confirmation of the fire safety training to be given to residents on arrival and of the arrangements for reviewing the Fire Strategy once the Site is occupied. PPC also requests confirmation of the personal emergency evacuation plan (PEEP) arrangements for residents with mobility, hearing or sight impairments; of whether the effect on neighbouring occupiers, including the prison, the village of Piddington, the Traveller site and residents along the B4011, of noise from fire alarms and attending emergency vehicles has been assessed; and of the on-site water supply available to fight a fire, given that the Site is not mains-fed, and the cost of securing an adequate supply.

(c) Policing demand.

PPC approaches this carefully. It does not assert, and expressly does not adopt, any proposition that the prospective occupants present an elevated risk of offending. The relevant and evidenced point is different: independent inspection and audit of comparable large sites has recorded significant recorded incident volumes, and public order policing associated with protest activity at asylum accommodation locations has, in recent years, placed substantial and documented demands on police resources, including through mutual aid arrangements. Both are operational realities that Thames Valley Police is best placed to assess, and its assessment should be before the decision-maker. There is also a specific reason to test any assurance that additional policing costs will be funded. At RAF Scampton, Lincolnshire Police received only £136,000 of a promised £4 million. That is a concrete precedent that funding committed to a local force for a site of this kind may not, in the event, be delivered. Any resourcing assurance offered here should be examined against it.

9.6 Utilities, waste and the Infrastructure Delivery Plan

9.6.1 PPC requests confirmation of the assessed electricity and gas demand, the connection points, any network reinforcement required and the position of the relevant distribution network operators; of the proposed telecommunications provision; and of the waste management arrangements, including the volume and disposal route of municipal, clinical and food waste, and whether Cherwell District Council as waste collection authority and Oxfordshire County Council as waste disposal authority have been consulted.

9.6.1A PPC notes that the Applicant's own material acknowledges that a network upgrade will be required within the Site and that, no foul waste being treated on site, waste from the Phase 1 septic tanks would be transported by tanker to Bicester Sewage Treatment Works, where capacity is not established beyond the possibility that headroom "may" exist; more generally, the capacity of the existing utility networks serving the Site has not been determined, notwithstanding that the Applicant proposes to proceed on the basis of temporary solutions. PPC requests confirmation of the position should those networks, or the headroom at Bicester Sewage Treatment Works, prove insufficient, and in particular of any consequential effect on planned local housing growth that also depends on that headroom.

9.6.2 Site A does not appear as an allocated or anticipated growth location in Cherwell's Infrastructure Delivery Plan. The infrastructure improvements identified in that Plan - including highway capacity works, active travel measures and utilities provision - are calibrated to planned growth at and around Bicester, funded through the Community Infrastructure Levy and section 106 obligations attaching to allocated sites.

9.6.3 PPC submits that this absence is itself evidentially significant. The Site has never been assessed, at any point in the plan-making process, as a location suitable for accommodating a population increase of this magnitude. It follows that the existing Infrastructure Delivery Plan cannot be treated as having provided for, or as mitigating, the additional infrastructure burden this proposal would create.

9.6.4 PPC notes that development brought forward under the Crown Development route is liable to the Community Infrastructure Levy where the relevant charging authority has a charging schedule in force. PPC requests confirmation of the CIL position for this application, of the amount assessed as payable, and of whether any relief or exemption is claimed.

9.6.5 Overhead power lines cross the northern part of the Site. This is a material physical constraint that the published material does not appear to address. It bears on several matters at once, and PPC sets them out here so that each can be tested.

9.6.6 The constraint operates in four ways.

(a) Developable area. Overhead lines carry statutory safety clearance distances and, in most cases, easement or wayleave restrictions. Land beneath and adjacent to the lines cannot ordinarily be built on, and its use for occupied buildings, play space or gathering areas is limited. The effect is to reduce the area actually available for development.

(b) Capacity. If the developable area is smaller than the Site's gross area, it cannot be assumed that in the order of 1,250 places can be accommodated at acceptable densities. This compounds the point PPC makes elsewhere: until the Applicant states the maximum capacity applied for, and shows it against a plan that respects this constraint, the proposal cannot properly be tested.

(c) Health and amenity. Proximity of residential-equivalent accommodation to high-voltage overhead lines is a recognised planning and public concern. Whatever view is ultimately taken of it, it is a matter that must be assessed openly, not left unaddressed.

(d) Diversion and deliverability. If the lines were to be diverted or placed underground to release the constrained land, that carries significant cost, third-party agreement and programme implications. These go directly to whether the scheme is deliverable within the timescale the Applicant asserts.

9.6.7 PPC therefore requests that the Applicant confirm: the operator and voltage of the overhead lines; the extent of any easement, wayleave or safety clearance affecting the Site; the developable area remaining once that constraint is applied; whether any diversion or undergrounding is proposed, and if so its cost, programme and status; and how the proposed layout and capacity respect the constraint. PPC records the need to obtain the relevant plans and the operator's position as an evidence item.

9.7 Conclusion on infrastructure

9.7.1 Taken together, the material summarised above establishes a consistent pattern: infrastructure that is already operating close to, or at times beyond, its design assumptions, in a catchment with known constraints, where the deliverability of the further investment required is itself now uncertain, and where no site-specific capacity assessment has been produced or published for any of the relevant utilities or services.

9.7.2 PPC submits that permission should not be granted and certainly not through an accelerated procedure with limited scope for technical scrutiny, until comprehensive, site-specific capacity assessments, agreed with the relevant statutory undertakers and service providers, have been produced and published for public and professional scrutiny.

9.8 The position following publication of the application documents

The Applicant confirms PPC's central factual premise

9.8.1 The premise at 9.2.2, that the growth upgrade at Bicester Sewage Treatment Works was designed to serve a population equivalent rising to 67,840 at a 2026 design horizon, is confirmed by the Applicant's own drainage consultant, who goes further:

9.8.2 "Bicester WwTW has recently undergone a significant upgrade to respond to the requirement for increased treatment capacity, addressing a projected increase in Population Equivalent (PE) from approximately 49,500 to 67,840 at the 2026 design horizon. This investment indicates that there may be available headroom within the treatment works to accommodate the proposed development, subject to confirmation of both process capacity and environmental permit compliance by Thames Water and the Environment Agency. **It is not clear whether the design population for 2026 has materialised and therefore whether any headroom is likely to be available against this figure.**"

9.8.3 The same document records that "The additional population will increase flow to the works as the PE will be increased by circa. 4% due to the new development, this may cause the total WwTW flow to exceed the currently permitted value and should this be the case, a new/revised permit will be required"; and that "The site lies within a Nitrate Vulnerable Zone (NVZ) and a Drinking Water Safeguarding Zone (DW SZ) associated with surface water abstraction. These designations increase

the sensitivity of the receiving environment and may impose additional constraints on wastewater discharge quality and nutrient loading."

The nine questions at 9.2.13

9.8.4 The answer to each of PPC's nine questions is that the matter is unresolved. In summary: it is not confirmed whether the Site would discharge to Bicester Sewage Treatment Works; the current actual dry weather flow, flow to full treatment and population equivalent loading are not stated against permitted and design capacity; wet-weather and dry-weather headroom is not stated; the additional flows are stated (a design population of 1,386 at 140 litres per person per day, with a 20 per cent infiltration allowance and a peaking factor of 2.5) but are not tested against capacity; an on-site treatment solution **is** proposed and its consenting position with the Environment Agency is that no application has been made; the effect on sewer surcharge, property flooding and storm spill frequency is not assessed; the programme and funding status of any further growth scheme is not addressed; Thames Water has provided no written position as sewerage undertaker; and the Environment Agency has provided no position on the receiving water bodies.

9.8.5 The proposition at 9.2.14, that "A right to connect is not evidence of capacity to treat", is demonstrated by the application in an unexpected way. Because capacity to treat cannot be established, the Applicant has abandoned connection as the design basis and proposes instead to construct its own treatment works. That is not a resolution of the constraint PPC identified. It is a consequence of it, and it creates a distinct set of impacts which PPC advances as Ground 13 at Section 15A.1.

9.8.6 The only correspondence from Thames Water anywhere in the submission is a Property Searches asset location search. That is a records and mapping product. Its own terms state that "No responsibility can be accepted for any error or omission in the replies", it says nothing about capacity, and it directs the enquirer to Developer Services for "sewer connections, budget estimates, diversions or building over issues". No such enquiry has been made.

Water, electricity, gas and telecommunications

9.8.7 Water. "Site Inspection suggests that the site network is of limited capacity relative to any concentrated development." The design proceeds "on the assumption that the potable water will be supplemented via a storage tank system sized at 90l/person to offset peak loads... (subject to available capacity)". No flow and pressure test has been carried out, although the Thames Water search itself offers one. At the stated 140 litres per person per day for a design population of 1,386, the new potable demand is of the order of 194 cubic metres per day, in an area of serious water stress, against a policy standard of 110 litres per person per day.

9.8.8 Electricity. "the condition, capacity and configuration of this network are currently unknown. The capacity of the primary intake, along with the location and ratings of existing distribution points, transformers and substations, has not been verified at this stage." The estimated maximum demand is approximately 2.16 MVA, and "**the current proposal assumes that the existing electrical infrastructure cannot be relied upon**, and therefore temporary and/or permanent generator provision shall be incorporated to support the development". The consequences of that are advanced as Ground 14 at Section 15A.2. PPC further requests confirmation of the cost of any works required if the electricity network is ultimately relied upon for connection, and of the effect of any such connection on capacity available to other local users and to planned growth in Bicester and its surroundings.

9.8.9 Gas. "There is no proposed gas use on site." All space heating, hot water and cooking for 1,256 residents and 130 staff must therefore be electrical, on a network the Applicant says cannot be relied upon.

9.8.10 Telecommunications. "New telecommunication connections will be required for the site." No provisioning confirmation has been obtained.

Healthcare, policing, fire and ambulance

9.8.11 The requests at 9.4.2 and 9.5.1 are unanswered. Paragraph 6.12 of the Planning Proposal Statement asserts that two named general practices, at 4.5 km and 4.9 km, are "currently under capacity and accepting new patients", cites no source and records no engagement, and concludes that "The proposed development would not adversely impact on the capacity of local health care services as the proposals would include health, well-being and leisure facilities on-site." The on-site provision is a medical centre comprising eight consulting rooms. No position has been obtained from the Integrated Care Board. The Secretary of State's written statement records the nearest accident and emergency services as being at the John Radcliffe Hospital, approximately 13.4 km distant, and no assessment of accident and emergency or ambulance capacity appears anywhere. The Equality Impact Assessment records that "The exact provision for this Site is subject to discussion with the local health authorities."

9.8.12 No capacity or resourcing position has been obtained from Thames Valley Police, Oxfordshire Fire and Rescue Service or South Central Ambulance Service. The Equality Impact Assessment records that additional demand on police forces "may justify additional funding". The Fire Safety Strategy records that "Consultation with the Fire Service should be conducted".

What assists the Applicant

9.8.13 PPC records that the Utilities and Infrastructure Assessment concludes that "there are no known utility apparatus that would represent an insurmountable constraint to the proposed development"; that the overhead line constraint identified at 9.6.5 has been designed around, with accommodation kept outside the zone of influence and parking placed beneath the lines; and that the sewer flooding records for the OX25_1 postcode area disclose no recorded incidents of internal or external sewer flooding.

What remains outstanding

9.8.14 Each of the nine matters at 9.2.13; a Thames Water pre-development enquiry response on process and hydraulic headroom at Bicester Sewage Treatment Works and on the capacity of the intervening network and pumping stations; a Thames Water flow and pressure test and water supply capacity confirmation; an SSE point of connection offer or capacity response for the stated 2.16 MVA; substantive responses from the Integrated Care Board, Thames Valley Police, Oxfordshire Fire and Rescue Service and South Central Ambulance Service; the developable area remaining once overhead line clearances and easements are applied; a waste management strategy with responses from the waste collection and disposal authorities; and confirmation of the Community Infrastructure Levy position sought at 9.6.4.

10. Ground 7: Ecology, Protected Species and Biodiversity Net Gain

Status in Version 4.0	**STANDS AND IS MATERIALLY STRENGTHENED; NARROWED IN TWO PARTICULARS. No biodiversity net gain information of any kind has been submitted. Nine protected species surveys are outstanding. Natural England's advice is non-binding, was given without sight of the drainage design, rests on two premises the Applicant had already abandoned, and required re-consultation which has not occurred. PPC withdraws its regulation 63 reservation and corrects its account of the historic baseline.**
Assessed at	Section 10.6 below

10.1 The correct legal framework

10.1.1 PPC's earlier draft referred to the need for a "lawful Habitats Regulations assessment". That reference is corrected here, because accuracy matters and because the corrected analysis is no weaker.

10.1.2 The relevant obligations are as follows.

(a) European protected species. The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012) create offences in relation to European protected species, including all species of bat and the great crested newt (regulations 43 and 44 and Schedule 2). A licence under regulation 55 is required for otherwise unlawful acts, and may be granted only where the three tests - imperative reasons of overriding public interest or other qualifying purpose, absence of a satisfactory alternative, and maintenance of favourable conservation status - are met. Regulation 9(3) imposes a duty on competent authorities, in the exercise of their functions, to have regard to the requirements of the Habitats Directive so far as they may be affected. Government guidance is clear that a decision-maker must have sufficient information to conclude that a licence is likely to be granted before permitting development which would otherwise offend.

(b) Site-based assessment. Regulation 63 (appropriate assessment) is engaged only where a plan or project is likely to have a significant effect on a European site. PPC has not identified a European site within the likely zone of influence and does not assert that regulation 63 is engaged. If the Applicant's ecological work identifies a hydrological or functional linkage to any European site, the position would change, and PPC reserves its position.

(c) Domestic protected species and habitats. The Wildlife and Countryside Act 1981 (as amended) protects wild birds, certain other species and Sites of Special Scientific Interest. Section 28G imposes a duty on public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which an SSSI is of special scientific interest. **That duty applies to the Secretary of State in determining this application**, and is engaged by the proximity of the Arncott Bridge Meadows SSSI.

(d) The general biodiversity duty. Section 40 of the Natural Environment and Rural Communities Act 2006, as amended by section 102 of the Environment Act 2021, requires public authorities to have regard to the conservation and enhancement of biodiversity from time to time, and to determine and take such action as they consider appropriate.

(e) Biodiversity net gain. Schedule 7A to the 1990 Act, inserted by Schedule 14 to the Environment Act 2021, imposes the biodiversity gain condition. Government guidance confirms that, unless otherwise exempt, the grant of planning permission under the Crown Development route is subject to that condition, requiring submission of pre-development habitat value information with the application and approval of a Biodiversity Gain Plan achieving a minimum 10 per cent net gain before commencement, with the decision notice specifying who is to be the planning authority for the purpose of determining the Plan.

10.2 The biodiversity net gain position as at July 2026

10.2.1 The BNG regime is in transition, and precision matters.

10.2.2 Regulations laid in July 2026 bring the following changes into effect on **6 August 2026**, applying to applications submitted on or after that date: a new exemption for sites of 0.2 hectares or less (unless on-site priority habitat is negatively affected); a new exemption for temporary development where land is to be reinstated within **five years or less** (again subject to the priority habitat qualification); modification of the biodiversity gain hierarchy for minor development; and removal of the existing exemption for self-build and custom-build development. Changes to the statutory biodiversity metric and transitional arrangements accompany those regulations. Mandatory BNG for nationally significant infrastructure projects is to apply from 2 November 2026.

10.2.3 None of those changes assists the Applicant.

The Site is materially larger than 0.2 hectares. The stated minimum operational life of ten years places the development well outside the new five-year temporary-development exemption. It is not minor development. The full 10 per cent biodiversity gain obligation therefore applies.

10.2.4 PPC accordingly requests confirmation that:

- the application is accompanied by the statutorily required biodiversity gain information, including the pre-development biodiversity value and the date by reference to which it is calculated;
- no earlier date has been proposed under paragraph 5 of Schedule 7A for calculating the pre-development value by reference to a degraded baseline (and, if it has, the justification for it);
- the calculation uses the current statutory metric, with transitional arrangements identified;
- the intended route to achieving gain is stated (on-site, off-site, statutory credits) with evidence of deliverability and of the 30-year maintenance and monitoring arrangements; and
- the decision notice, if permission is granted, identifies the planning authority for the purpose of determining the Biodiversity Gain Plan.

10.3 The ecological baseline is materially out of date

10.3.1 The Site's ecological evidence base, so far as PPC has been able to establish, derives substantially from surveys and assessments carried out in connection with Ministry of Defence estate work around 2008–2010, at a time when the Site was in continued use as a military storage and distribution depot and was not being considered for large-scale residential-equivalent occupation.

10.3.2 PPC's review of the 2010 Land Quality Assessment prepared for Defence Estates records that Site A and the adjoining C Site fall within or in close proximity to land of moderate ecological sensitivity; that a Site of Special Scientific Interest lies close to the strip of land connecting C Site to other parts of the wider estate; and that both sites are bordered predominantly by agricultural land forming part of the Upper Thames Tributaries Environmentally Sensitive Area.

10.3.3 PPC's ecological advisers consider it highly unlikely that a habitat and protected species baseline compiled on that basis, and now approaching two decades old, can support either the current biodiversity metric calculation that Schedule 7A requires or a defensible assessment of the likelihood of a regulation 55 licence being granted. Populations and habitat use patterns of bats and great crested newts change materially over such a timescale, and current professional standards require multi-season, appropriately licensed survey work rather than desk-based review of historic data.

10.3.4 PPC further observes that a site which has been substantially inactive for an extended period is likely, in the absence of survey evidence to the contrary, to have accumulated ecological interest rather than lost it. Cessation of intensive operational use commonly permits colonisation of hardstanding, buildings and boundary features by species including bats, reptiles, nesting birds and invertebrates. PPC does not assert what is present; it asserts that this cannot be known without survey, and that the absence of survey is not evidence of absence.

10.3.5 There is direct corroboration close at hand. Confirmed populations of bats and great crested newts are recorded at Graven Hill, which was built on another part of the same former Ministry of Defence Bicester estate. That is confirmed species presence, not merely habitat potential, on land sharing this Site's history and character. It reinforces the case that a current, multi-season survey of Site A is required before any biodiversity metric or licensing assessment can be relied upon.

10.4 Landscape-scale and cumulative ecological considerations

10.4.1 The Site sits within a landscape of recognised ecological value: the River Ray floodplain and associated wetland habitats; the Arncott Bridge Meadows, Wendlebury Meads and Otmoor SSSIs; the Berks, Bucks and Oxon Wildlife Trust's Bernwood Forest and Ray Valley Living Landscape; and Conservation Target Areas identified in Oxfordshire's biodiversity evidence base. Cherwell's Green and Blue Infrastructure Strategy identifies the Otmoor, Bernwood and Ray focus area as of high natural capital value and as containing more designated sites than any comparable area in the county.

10.4.1A PPC also raises the effect of noise, light and vibration on this landscape's ecological value, both during construction and from the continuous 24-hour occupation, external security lighting, CCTV illumination and generator provision that the proposal would introduce (see 15A.2). Artificial light at night is recognised to delay bats' emergence from roosts, to disrupt their nocturnal foraging patterns, and, in combination with persistent illumination around roost access points, to cause roost desertion; noise and vibration, including from generator operation, are separately capable of disturbing foraging bats and great crested newts known to use the Site and its surroundings, and of affecting nesting, breeding and feeding sites more generally, and the routes connecting them. PPC understands from local residents that bats are regularly seen foraging over the Site itself, which would corroborate rather than qualify the confirmed populations recorded nearby at Graven Hill (10.3.5). The Site also lies close to other wildlife assets not otherwise addressed in this representation, including the Jubilee Nature Reserve, a District Wildlife Site some 250 metres to the south, and ancient woodland, including Piddington Wood, within a kilometre; the future occupants of the Site will not be confined to it, so these assets are capable of being affected notwithstanding the Site's own lack of public access.

10.4.2 Two cumulative issues arise which, so far as PPC is aware, have not been the subject of any combined assessment:

(a) Interaction with wastewater effects.

The Site's habitat and construction impacts, and the wastewater and drainage pressures affecting the same watercourse system (Section 9.2), affect the same receiving environment. Natural England's and the Environment Agency's guidance would ordinarily expect such effects to be considered in combination rather than in isolation.

(b) Interaction with the Local Nature Recovery Strategy.

Section 104 of the Environment Act 2021 requires Local Nature Recovery Strategies. The Oxfordshire Strategy identifies priorities and opportunity areas which a development of this scale should be assessed against, and which are material to the location of any off-site biodiversity gain.

10.4.3 PPC notes, for completeness and in the interests of balance, that Natural England has notified the Secretary of State of its intention to prepare Environmental Delivery Plans under Part 3 of the Planning and Infrastructure Act 2025, including for great crested newts, and that the Nature Restoration Fund may in due course provide a strategic route to addressing certain species impacts. No such Plan is in place for this area, and none is available to this Applicant at this time. The existence of a prospective future mechanism does not relieve the Applicant of the obligation to establish a lawful current baseline.

10.5 Conclusion and relief sought

10.5.1 The Applicant has not produced a current ecological survey of the Site. What is required is a multi-season survey, appropriately licensed, covering the Site and its surrounding zone of influence. It should include preliminary ecological appraisal, bat roost and activity survey, great crested newt survey or eDNA screening of ponds within the relevant radius, breeding bird survey, reptile survey, badger survey and habitat condition assessment to the current metric. Until that survey exists, the Secretary of State cannot be satisfied that the proposal complies with Chapter 15 of the Framework, with Policies ESD 10, ESD 13 and ESD 17 of the adopted Local Plan, with the section 28G duty, or with the freestanding statutory obligations identified above.

10.5.2 PPC requests specifically that this be recorded and addressed **before** determination, rather than being deferred to the discharge of a biodiversity gain condition after permission has been granted. The distinction matters: the biodiversity gain condition operates on a baseline which, if wrongly established, cannot be corrected retrospectively; and the availability of a regulation 55 licence is a matter which the decision-maker must be satisfied about at the point of granting permission, not afterwards.

10.6 The position following publication of the application documents

10.6.1 The baseline. PPC corrects paragraph 10.3.1. It no longer contends that the ecological evidence base derives substantially from Ministry of Defence estate work of 2008 to 2010. The Preliminary Ecological Appraisal records at its section 2.1: "**No historic ecological surveys relevant to the site have been identified.**" The correct position, which is a stronger one, is that there was no site-specific ecological baseline for the Site at all before March 2026.

10.6.2 Regulation 63. PPC withdraws the reservation at 10.1.2(b). The Habitats Regulations Assessment screening concludes that there are no European sites within 15 kilometres, the nearest being the Oxford Meadows Special Area of Conservation at approximately 15.8 kilometres, and that there is no hydrological pathway to any European site. Natural England concurred on 4 June 2026. PPC accepts that conclusion and does not pursue any regulation 63 point.

Biodiversity net gain

10.6.3 PPC has been unable to identify **any** biodiversity net gain information anywhere in the submitted material. There is no metric calculation, no pre-development biodiversity value, no baseline calculation date, no habitat condition assessment to the statutory metric, no statement of the intended route to gain, and no exemption claimed. The Planning Proposal Statement addresses biodiversity at its paragraphs 7.34 to 7.39 and makes no reference to Schedule 7A to the 1990 Act, to the biodiversity gain condition, to the statutory metric or to the 10 per cent objective.

10.6.4 Planning Practice Guidance Paragraph 053 (Reference ID 44-053-20250512) confirms that a Crown Development permission is "subject to the condition that the biodiversity gain objective is met", requiring a minimum 10 per cent net gain unless otherwise exempt. For the reasons at 10.2.3, none of the exemptions assists this proposal.

10.6.5 This is, in PPC's submission, the clearest single information failure in the submission. It is a statutory requirement and not a matter of professional judgement. PPC repeats the point at 10.5.2: the condition operates on a baseline which, if wrongly established, cannot be corrected retrospectively. The habitat survey underpinning any baseline was carried out between 26 March and 10 April 2026, which the appraisal itself describes as "just outside the optimal survey window". PPC repeats the five requests at 10.2.4 in full.

The ecological baseline as it now stands

10.6.6 The Preliminary Ecological Appraisal is a single-visit walkover. Its own limitations section states: "To determine presence or likely absence of protected species usually requires multiple visits at suitable times of the year... **This report cannot, therefore, be considered a comprehensive assessment of the ecological interest of the site.**" Access was constrained: "preliminary roost assessments (PRAs) of buildings only completed on the exterior of buildings", with two trees assessed from beyond a fence line and limited access to woodland within the Site.

10.6.7 Nine matters are outstanding, and the Applicant lists them itself at paragraph 7.34 of the Planning Proposal Statement: specific SSSI mitigation to be discussed with Natural England; badger pre-construction checks; hazel dormouse surveys; bat roosting surveys; bat surveys in trees; bat foraging and commuting activity surveys; breeding bird surveys; great crested newt presence surveys; and reptile surveys. Paragraph 7.35 then states that all mitigation "are to be included as part of the detailed design".

10.6.8 Bats and great crested newts are European protected species. As PPC states at 10.1.2(a), a decision-maker must have sufficient information to conclude that a licence under regulation 55 is likely to be granted before permitting development which would otherwise offend. The surveys which would establish whether an offence is engaged have not been carried out.

The Arncott Bridge Meadows SSSI and the section 28G duty

10.6.9 This matter is new and is, in PPC's submission, of the first importance. The sequence is as follows.

- **4 June 2026.** Natural England advises, under its charged Discretionary Advice Service: "From the information provided the proposal could have potential significant effects on Arncott Bridge Site of Special Scientific Interest (SSSI)... I confirm that Natural England will need to be consulted with further information regarding hydrological impact pathways between the application site and the SSSI, in order to determine the significance of these impacts and the scope for mitigation. **Please re-consult Natural England once this information has been obtained.**"
- **June 2026.** The Drainage Design Statement is issued. It selects Approach 3, a new on-site wastewater treatment works discharging to a watercourse, and records that Phase 1 "cannot be restricted to greenfield rates".

- **23 July 2026.** Natural England advises: "**As Natural England has not had sight of the drainage details themselves**, our advice at this stage is based on the email of 16 July 2026... I note that **hydrological connection between the site and the SSSI cannot be ruled out**... Based on the detail provided in your email of 16 July 2026 we note that **the project will be designed to ensure greenfield runoff rates which are lower than existing runoff rates**... I also note that **it is anticipated that foul water will be connected to mains and should this not be the case Natural England would also need to be consulted on the alternative means. Please re-consult Natural England once this information has been obtained.**"

10.6.10 Natural England's advice therefore rests on two express premises, and neither holds. Foul water is **not** proposed to connect to mains: the selected approach is a new on-site works discharging to a watercourse. Greenfield runoff rates are **not** achieved: the Drainage Design Statement records at paragraph 8.2 that in Phase 1 "flows from this area cannot be restricted to greenfield rates", and that a further 440 square metre concrete area will likewise be uncontrolled.

10.6.11 PPC has identified no evidence of any re-consultation of Natural England on either matter. The advice is in any event expressly "not binding in any way" and expressly not "a statutory response or decision". Natural England has not been asked its view on a wastewater treatment works discharging to a watercourse within the catchment of a Site of Special Scientific Interest to which it says a hydrological connection cannot be ruled out.

10.6.12 The Secretary of State is subject to the duty in section 28G of the Wildlife and Countryside Act 1981 in determining this application (10.1.2(c)). PPC submits that the duty cannot be discharged on the present material.

What assists the Applicant

10.6.13 PPC records that a Preliminary Ecological Appraisal, a Habitats Regulations Assessment screening and Natural England advice have all been produced and published; that the regulation 63 position is resolved in the Applicant's favour; that badger and water vole require pre-construction checks only rather than full further survey; and that a tree survey has identified no Tree Preservation Orders, no ancient woodland and no ancient, veteran or notable trees on the Site, although that survey has not itself been submitted.

What remains outstanding

10.6.14 Biodiversity net gain information as required by Schedule 7A; all nine outstanding protected species surveys, carried out in appropriate seasons, before determination, together with an assessment of the likelihood of a regulation 55 licence; a legible version of sections 3 and 4 and Appendix B of the Preliminary Ecological Appraisal; the tree survey and an Arboricultural Impact Assessment; and formal re-consultation of Natural England on the actual drainage strategy, with publication of its statutory response.

11. Ground 8: Land Quality, Contamination and Ground Conditions

Status in Version 4.0	**STANDS AND IS MATERIALLY STRENGTHENED. The 2010 assessment is said to be superseded, but the superseding document is a desk study containing no intrusive data at all. No soil, groundwater or ground gas sample has been taken on a former ordnance depot where asbestos is confirmed and munitions were handled and stored. The conceptual site model and the assessment criteria adopted are not legible in the version published.**
Assessed at	Section 11.4 below

11.1 The Site's history

11.1.1 PPC's review of the 2010 Land Quality Assessment prepared by Entec UK Limited for Defence Estates records that the Site was used from 1943 onward, first as a Signals and Wireless Sub-Depot within the Central Ordnance Depot Bicester, subsequently as part of the wider Base Ordnance Depot and, from 1992, the Defence Storage and Distribution Centre Bicester, handling clothing, rations, tents, packaging materials and general military stores. That assessment recorded one Environmental Sensitivity Area record on site; groundwater conditions including a confined aquifer under high pressure at depth; and at least one recorded pollution incident involving mixed and waste oils within 250 metres of the Site in March 2002.

11.1.2 That assessment drew on an earlier Phase Two investigation by Aspinwall, which found the Site to be "generally unsuitable for redevelopment to a domestic end use without remediation" (Aspinwall Phase Two assessment, cited in DIO/Entec, 2010). That is a direct finding, by the Ministry of Defence's own consultants, on the very question this proposal raises. It carries particular weight because the finding pre-dates, and is independent of, the current dispute.

11.1.3 Critically, that assessment was prepared on the express basis that the Site was to be retained by the Ministry of Defence for redevelopment with a **commercial or industrial** end use in mind.

11.2 Why the change of use changes the assessment

11.2.1 A land quality assessment prepared to inform commercial or industrial redevelopment applies materially different, and generally less exacting, exposure assumptions from one required to inform residential-equivalent occupation.

11.2.2 The relevant differences are well established in professional practice and in statutory guidance under Part 2A of the Environmental Protection Act 1990:

- **Exposure duration and frequency.**

  Residential-equivalent occupation involves people living, sleeping and eating on site, present for extended and continuous periods, rather than attending during working hours.

- **Vapour intrusion.**

  Volatile contaminants migrating into occupied buildings are of limited relevance to sparsely occupied industrial buildings but of central relevance to sleeping accommodation.

- **Direct contact with soils.**

  Outdoor amenity, recreation and growing areas create direct contact pathways absent from a hardstanding-dominated storage use.

- **Receptor sensitivity.** Generic assessment criteria for residential end uses are materially more stringent than those for commercial and industrial end uses.
- **Ground gas.**

  Where made ground or organic fill is present, ground gas protection measures appropriate to residential occupancy may be required.

11.2.3 PPC is not aware that any updated Phase 1 preliminary risk assessment or Phase 2 intrusive investigation, calibrated to the proposed residential-equivalent use and reflecting current guidance, has been produced or published in respect of Site A, some sixteen years after the most recent assessment PPC has been able to identify.

11.2.4 PPC notes the requirements of paragraphs 189 to 191 of the Framework (December 2024): that planning decisions should ensure a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination; that adequate site investigation information prepared by a competent person is presented; and that responsibility for securing a safe development rests with the developer and landowner.

11.3 Evidence requested

11.3.1 PPC requests that a current, use-specific land contamination assessment be produced and published before determination, addressing in particular:

- a conceptual site model constructed for the proposed residential-equivalent end use, identifying all plausible source–pathway–receptor linkages;
- residual risk associated with historic fuel, oil and solvent storage, handling and disposal on the Site, including any underground storage tanks, interceptors, fuelling points and waste disposal areas;
- the implications of the confined, artesian aquifer conditions recorded beneath the Site for foundation, drainage, piling and ground-working design, and the risk of creating preferential pathways to the aquifer;
- controlled waters risk assessment, given the Site's position in the River Ray catchment and the Environment Agency's position as a prescribed consultee;
- asbestos risk in buildings of the relevant construction period, and in made ground, together with the management strategy for demolition and refurbishment;
- unexploded ordnance risk assessment appropriate to a site with a wartime and post-war ordnance depot history;
- a specific radiological survey of building A33, which has been identified as carrying potential radiological contamination, together with any other buildings of comparable former use;
- ground gas monitoring where made ground is present; and
- a remediation strategy and verification plan calibrated to the residential-equivalent end use rather than the commercial or industrial benchmark applied in 2010.

11.3.2 PPC submits that this evidence goes not only to the acceptability of the development but to the welfare of the people who would be accommodated. Where the proposed occupants are, on the Applicant's own account, to live on site for extended periods with limited need to leave, the adequacy of the land quality assessment is a matter of direct human consequence.

11.4 The position following publication of the application documents

What the application confirms

11.4.1 A Preliminary Geo-environmental and Geotechnical Assessment dated May 2026 has been submitted. It is, on its own terms, a **desk study**. Its sources are a commercial environmental database report dated 2 April 2026, British Geological Survey mapping, Defra MAGIC mapping and a 2018 Land Quality Assessment prepared for the Defence Infrastructure Organisation. Ground data comprises two boreholes located some 300 metres off site.

11.4.2 The Applicant's own drainage consultant states the position in terms: "**No intrusive ground investigation has been undertaken at this stage. The ground conditions described above are based on desk-based information only and remain unverified.** Further investigation will be required to confirm ground conditions, groundwater levels, contamination risks, and the suitability of the site to support drainage and foundation design." The same paragraph records that "The current understanding of ground conditions is derived solely from British Geological Survey (BGS) mapping and desk-based information."

11.4.3 Two constraints are identified: differential settlement from poor quality concrete and variable ground conditions; and made ground potentially containing contaminants including asbestos-containing material. The Secretary of State's written statement records that "An Asbestos Demolition Survey was undertaken by the HO appointed consultant in April 2026 and **identified the presence of ACM**". That survey has not been submitted.

11.4.4 Paragraph 7.54 of the Planning Proposal Statement states: "The presence and extent of potential contamination will be assessed further by undertaking targeted sampling in the areas of known made ground and **the area where munitions were handled and stored**. The requirement for further assessment is to be secured by a pre-commencement condition."

11.4.5 PPC's complaint at Section 11 was that the most recent assessment it could identify had been calibrated to a commercial or industrial end use. The Applicant states that the 2010 assessment is superseded. PPC accepts that statement, and to that extent the criticism of a sixteen-year-old assessment falls away. But the position is not improved by it. The document said to supersede the 2010 assessment contains no intrusive data of any kind: no soil sample, no groundwater sample, no ground gas monitoring and no infiltration test. The evidential basis for placing 1,256 people to live and sleep on a former Central Ordnance Depot is two desk databases and two off-site boreholes.

11.4.6 PPC records, and does not overstate, that it **cannot verify** what end-use scenario or generic assessment criteria the 2026 assessment adopted, because its sections 2 to 5 and its Appendix E, containing the conceptual site model and the ground contamination risk assessment, contain no readable text in the version published. PPC therefore does not assert that commercial or industrial criteria were applied. It makes two narrower submissions. First, that the decision-maker cannot be satisfied under paragraph 189 of the Framework that the Site is suitable for its proposed use unless he can read the conceptual site model and the exposure scenario on which the assessment rests. Second, that neither the Parish Council, nor Cherwell District Council's environmental health function, nor the Environment Agency can scrutinise that assessment while it remains unreadable, and that this engages article 9 of SI 2025/411.

11.4.7 PPC further records that no controlled waters risk assessment appears anywhere in the submission, notwithstanding that the Site lies over a Secondary A superficial aquifer, entirely within a Drinking Water Safeguard Zone (Surface Water), within a Nitrate Vulnerable Zone and within the River Ray catchment; that no ground gas risk assessment appears, notwithstanding acknowledged made ground and a sleeping accommodation end use; that no investigation of underground storage tanks, interceptors or fuelling points has been undertaken, notwithstanding that the environmental database records unspecified tanks on the Site; and that no author is named on the report, which bears on paragraph 190 of the Framework and the requirement for information prepared by a competent person.

11.4.8 The request at 11.3.1 for a specific radiological survey of building A33 is repeated. PPC has been unable to identify any reference to that building, or to radiological screening, in the submitted material; the only relevant heading in the geo-environmental report is "Radon", and it carries no readable text.

Unexploded ordnance

11.4.9 The request at 11.3.1 for an unexploded ordnance risk assessment appropriate to a site with a wartime and post-war ordnance depot history has been met in form but not in substance.

11.4.10 Paragraph 7.55 of the Planning Proposal Statement states that "No evidence has been identified within the public domain of past UXO incidents affecting the Site, and the overall risk is assessed as low." The Preliminary UXO Risk Assessment of 31 March 2026 states, in its own words: "Levels of risk have been identified relating to Explosives Storage, Production and Processing, Potential Burial Sites, Disposal Sites and UXO from Defensive Action"; and, as to munitions, "Research for this preliminary level report has not identified information relating to the storage of munitions, but given the long association as a military site, **this cannot be discounted at this stage, and further research is warranted**". For each of three sources it states in identical terms that "the potential presence of UXO associated with this source **cannot be completely discounted without further detailed research**".

11.4.11 The assessment also records that the depot stored "large quantities of 20mm cannons, 40mm guns, 25pdr guns, 95mm guns and large quantities of barrels for 6pdr and 17pdr anti-tank guns"; that it assesses a scheme for **3,510 service users** on an area of investigation of **50.5 hectares**, neither of which corresponds to this application; and that "**As a construction project has not yet been defined for this site, it is not possible to complete a UXO Detailed Risk Assessment**".

11.4.12 The risk matrix at section 6.4 of that assessment is presented as a figure and is not legible in the version published. PPC therefore cannot confirm the rating assigned and does not assert that it is other than low. What PPC does say is that the statement at paragraph 7.55 of the Planning Proposal Statement is not supported by any readable text in the assessment, and that the assessment's own narrative identifies four elevated risk factors and recommends further research.

11.4.13 PPC records that a current desk study now exists; that it identifies the two principal constraints and proposes routes to their resolution; that an asbestos demolition survey has been carried out, albeit not submitted; and that the environmental database discloses no recorded pollution incidents within 500 metres of the Site in the last twenty-five years.

11.4.14 A Phase 2 intrusive ground investigation calibrated to residential-equivalent occupation, reported before determination; a legible conceptual site model with the generic assessment criteria and exposure scenario stated; a controlled waters risk assessment and a ground gas risk assessment; the Asbestos Demolition Survey of April 2026 and the asbestos management strategy for demolition and refurbishment; investigation of underground storage tanks, interceptors and fuelling points; radiological screening; a UXO detailed risk assessment for the scheme actually proposed with a legible risk matrix; and identification of the competent person under paragraph 190 of the Framework for each technical report.

12. Ground 9: Landscape, Character, Heritage and Dark Skies

Status in Version 4.0	**STANDS AND IS STRENGTHENED; NARROWED IN ONE PARTICULAR. A Landscape and Visual Statement has been produced, not an assessment to GLVIA3. No lighting assessment of any kind has been submitted, on a site where the local planning authority previously objected to an accommodation centre's lighting on both amenity and highway safety grounds. The heritage assessment is desk-based only, with no field evaluation.**
Assessed at	Section 12.5 below

12.1 The receiving landscape

12.1.1 Site A lies within open, predominantly agricultural countryside characteristic of the Ray valley and the wider Otmoor and Bernwood landscape. That landscape's openness and rural character contribute directly to the setting and separate identity of Piddington, Upper Arncott, Ambrosden, Blackthorn and the other small villages that surround it. Saved Policy C15 of the Cherwell Local Plan 1996 addresses the prevention of coalescence of settlements; Policy ESD 13 of the adopted Plan addresses local landscape protection and enhancement; Policy ESD 15 addresses the character of the built and historic environment; and Policy ESD 17 addresses green infrastructure. Saved Policy C28 of the 1996 Local Plan requires new development to be sympathetic in materials and appearance to the character of its urban or rural context.

12.1.2 PPC accepts that the Site is previously developed and that its former use as a secured military storage compound, accessed via a single gated entrance and substantially screened, has meant that its landscape and visual effect has historically been limited notwithstanding its industrial function.

12.1.3 That, however, is the point. The baseline against which the proposal falls to be assessed is a low-activity, low-illumination, low-movement, largely screened compound. The proposal is for a permanently occupied residential-equivalent facility for over a thousand people, operating 24 hours a day, with associated built form, external security lighting, CCTV installations, perimeter treatment, staffed entry control, servicing areas, parking and continuous vehicular and pedestrian activity. That is a fundamentally different order of landscape and visual effect, and the proposal cannot properly be presented as a continuation of the former use.

12.1.3A PPC also notes that the Landscape and Visual Statement describes the proposal as an opportunity to replace buildings in a poor state of repair with modern modular structures within the existing built envelope. The Site is presently in storage and warehousing use; new housing in the surrounding villages is overwhelmingly traditional in character and built in the local Cotswold stone, with outward-facing elevations in that material even where brick is used elsewhere in a development, and no development of this modern modular type exists in the four nearest villages, the closest comparator being at Graven Hill, some five kilometres away. PPC submits that a rural site presently used for storage, prominent from a busy road, cannot readily be made sympathetic to that context by the proposed built form, and that this engages Policy ESD 13 (tranquillity) and saved Policy C28 (sympathetic design), both identified at 12.1.1 above.

12.2 Dark skies and external lighting

12.2.1 PPC draws particular attention to lighting. Paragraph 136 of the Framework requires planning policies and decisions to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Paragraph 198 requires decisions to limit the impact of light pollution on, among other things, nature conservation.

12.2.2 This part of rural Cherwell is an intrinsically dark landscape. A facility with 24-hour security lighting, CCTV illumination and perimeter lighting at a location with no existing significant illumination will produce sky glow, light spill and glare of a character wholly new to the area.

12.2.3 The ecological consequence is separate from the amenity consequence, and is engaged by the presence of bats and by the Site's proximity to the River Ray corridor. Bats are a European protected species; artificial light at night is a recognised source of disturbance and of severance of commuting and foraging routes. Guidance published jointly by the Bat Conservation Trust and the Institution of Lighting Professionals addresses the assessment and mitigation of lighting effects on bats, and should be applied.

12.3 Absence of published landscape and visual evidence

12.3.1 PPC is not aware of any published Landscape and Visual Impact Assessment specific to the current proposal, and requests that any such assessment, prepared in accordance with the *Guidelines for Landscape and Visual Impact Assessment* (3rd edition) and Landscape Institute technical guidance, address directly:

- the landscape character baseline by reference to the National Character Area and to Oxfordshire's and Cherwell's landscape character assessments;
- the visual baseline, including views from public rights of way, from the B4011 and Widnell Lane, from the edges of Piddington, Upper Arncott, Ambrosden and Blackthorn, and from any elevated receptors;
- representative viewpoint photography with accurate visual representations of the proposed development, including at night;
- an obtrusive light assessment applying the Institution of Lighting Professionals' *Guidance Note 1 for the Reduction of Obtrusive Light*, identifying the environmental zone and the compliance position;
- the visual effect of security infrastructure, fencing, gatehouse, CCTV columns and signage;
- the effect on the perceived separation between settlements, engaging saved Policy C15;
- the cumulative landscape effect with other committed development in the wider Bicester area; and
- the landscape and visual effect at the end of the intended operational life, and the restoration position if the use ceases.

12.4 Heritage

12.4.1 The wider MOD Bicester estate includes buildings, structures and infrastructure of recognised historic interest associated with its wartime and Cold War defence function, including the Bicester Military Railway. Former RAF Bicester is separately recognised for its heritage significance and is the subject of Policy Bicester 8 of the adopted Local Plan.

12.4.2 PPC requests confirmation that any designated or non-designated heritage assets within or adjoining Site A, and their settings, have been identified and assessed, including through a desk-based archaeological assessment and, if appropriate, evaluation, having regard to:

- sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, so far as engaged;
- Chapter 16 of the Framework, and in particular the requirement at paragraph 207 to describe the significance of any heritage asset affected, with the level of detail proportionate to the asset's importance;
- the archaeological potential of the wider area, which includes Alchester Roman Town to the west; and
- Historic England's position as a prescribed consultee under article 13(1)(e) of SI 2025/411.

12.5 The position following publication of the application documents

Landscape and visual effect

12.5.2 The covering letter lists a "Landscape and Visual Assessment". The document submitted is a "Landscape and Visual **Statement**". PPC has been unable to identify any reference in it to the *Guidelines for Landscape and Visual Impact Assessment* (3rd edition), and it contains no significance-of-effect methodology, no sensitivity or magnitude ratings and no rated conclusions. It is a qualitative narrative.

12.5.3 The site visit was made "on 26th March 2026 during dry and bright weather with very good visibility", that is, in leaf-off conditions, and no leaf-on verification is recorded. The assessment relies substantially on intervening vegetation for screening. Three off-site representative views are presented, from the southern periphery of Ambrosden, from Muswell Hill and from Arncott Hill. No photomontages or accurate visual representations were produced. A zone of theoretical visibility is generated on the basis of a 6 metre development height. Mitigation is expressed as "Opportunities and Considerations" rather than as a committed scheme, and no landscape masterplan, planting scheme or landscape management plan has been submitted.

12.5.4 Of the eight matters PPC asked a landscape and visual assessment to address at 12.3.1, PPC assesses that none is addressed in the manner requested. In particular there is no obtrusive light assessment applying the Institution of Lighting Professionals' *Guidance Note 1*, no representative viewpoint photography with accurate visual representations including at night, no assessment of the visual effect of security infrastructure, fencing, gatehouse, closed circuit television columns and signage, no assessment of the effect on perceived separation between settlements, no cumulative assessment, and no assessment of the landscape and visual effect at the end of the operational life or of the restoration position.

12.5.5 PPC raises one question of substance, which it puts as a question rather than as a finding. Paragraph 7.30 of the Planning Proposal Statement summarises the Statement's conclusion as being that "the proposed development would unlikely bring about any perceptible landscape and visual change **due to the existing buildings on the site**", and that "the existing buildings on site are much larger than the proposed modular units". The application proposes to demolish those buildings: Table 2(a) of the same document identifies Buildings 30, 31, 32, 33 and 81, totalling 15,950 sqm, for demolition, retaining only Building A6 at 1,400 sqm. A conclusion that landscape and visual change would be imperceptible because the existing buildings are larger is difficult to reconcile with a proposal to remove 15,950 sqm of them. PPC asks the Applicant to confirm whether the assessment was carried out on the baseline as existing or on the baseline as it would be following the proposed demolition, and, if the former, that it be revisited.

Dark skies and external lighting

12.5.6 No lighting assessment, lighting layout, lux contour plan or obtrusive light assessment has been submitted. Paragraph 7.21 of the Planning Proposal Statement states: "The approval of a lighting scheme is to be secured by a planning pre-commencement condition." The Applicant's own EIA screening request records that "The current scheme design does not include details of lighting provision" and that "impacts from operational lighting are unknown".

12.5.7 PPC draws particular attention to the following, because it appears in the Applicant's own account of the planning history at paragraphs 2.19 and 2.20 of the Planning Proposal Statement. When the reserved matters for the 2003 permission on this same land were consulted upon, Cherwell District Council's South Area Planning Committee objected in these terms:

- "(2) The proposed lighting would result in **significant intrusion into the nighttime environment** and would be to the detriment of the character of the area surrounding the site."
- "(3) The proposed lighting would likely be **distracting to drivers on the adjacent B4011** and would be to the detriment of road safety."

12.5.8 The Applicant has therefore recorded, in its own submission, that the local planning authority previously objected to the lighting of an accommodation centre on this land on both amenity and highway safety grounds, and has then submitted no lighting information at all. The proposal is for a facility with 24-hour security operation, closed circuit television, perimeter treatment and controlled entry in an intrinsically dark rural landscape, within the Arncott Bridge SSSI impact risk zone and immediately adjacent to a Conservation Target Area, on a site where the Preliminary Ecological Appraisal identifies trees with bat roost potential. Cherwell District Council's adopted Local Validation Checklist requires a Lighting Assessment for "all planning applications that include external lighting". None has been provided.

Heritage and archaeology

12.5.9 An Archaeological and Heritage Desk-Based Assessment has been submitted. It is desk-based, supported by a walkover survey, and it identifies moderate to high archaeological potential. No geophysical survey and no trial trenching has been carried out. Paragraph 207 of the Framework, and Policy ESD 15 which the Applicant itself recites at paragraph 5.74, require a desk-based assessment "and, where necessary, a field evaluation". It is proposed instead that the matter be dealt with by a watching brief contingent on the removal of hardstanding, secured by condition, under a written scheme of investigation not yet agreed.

12.5.10 PPC adds a point it did not make in Version 3.0. The assessment records that the Site forms part of the Central Ordnance Depot completed in 1943, that the depot covered over 12 square miles with nearly 50 miles of railway track, that more than 20,000 people were employed there at its peak in 1944, and that "numerous storage hangars and much of the original infrastructure remain". It describes the depot as "the outstanding example in the UK of a bulk storage depot built during the Second World War, designed to be fully integrated into rail and road transport networks and is the precursor of the modern commercial distribution depots"; PPC records, in fairness, that the source record from which that description is drawn is stated to concern the Graven Hill sites rather than the Arncott sites of which Site A forms part. The application nonetheless proposes the demolition of 15,950 sqm of buildings within the depot, and the demolition plan identifies Nissen huts. PPC has been unable to identify any assessment of those structures, or of the dismantled railway alignments annotated on the drawings, as **non-designated heritage assets in their own right**, and no historic building recording is proposed in advance of demolition. Paragraph 209 of the Framework requires a balanced judgement having regard to the scale of any harm or loss and the significance of the asset. That judgement cannot presently be made.

12.5.11 PPC records a minor internal inconsistency: the walkover survey is dated 23 February 2026 at section 4.1 of the assessment and 11 March 2026 at section 9, and the written scheme of investigation is to be agreed with the "Oxfordshire County Council Archaeologist" in one place and the "Oxfordshire Historic Environment Officer" in another.

12.5.12 PPC records that the maximum building height is stated as 6 metres, which is materially lower than the existing warehouse buildings; that the heritage assessment finds no scheduled monuments within the 1 kilometre study area and concludes that there is no intervisibility between the Site and the twelve listed buildings in Piddington, a conclusion PPC does not challenge; and that a heritage desk-based assessment and a landscape document have both been produced where none previously existed.

12.5.13 A Landscape and Visual Impact Assessment to GLVIA3 with leaf-on verification and accurate visual representations including at night; a lighting strategy, lux contour plan and obtrusive light assessment applying ILP Guidance Note 1 and the Bat Conservation Trust and ILP bat lighting guidance, identifying the environmental zone; a landscape masterplan, planting scheme and landscape management plan; an assessment of the on-site military structures as non-designated heritage assets with proposals for historic building recording in advance of demolition; and pre-determination archaeological field evaluation, or the county archaeologist's written confirmation that it is not required.

13. Ground 10: Flood Risk, Drainage and Climate Resilience

Status in Version 4.0	**STANDS AND IS VERY SUBSTANTIALLY STRENGTHENED. The Flood Risk Assessment is written for a 50.1 hectare area and for "any future development", does not classify the flood vulnerability of the use proposed, states no climate change allowance, and relies on hydraulic modelling that has not been done. Phase 1 accommodation is placed on the lowest part of the Site with no attenuation at all, drained by a network the Applicant describes as non-operational. Neither the Environment Agency nor the lead local flood authority has been consulted.**
Assessed at	Section 13.4 below

13.1 Why this is a separate ground

13.1.1 PPC's earlier draft did not address flood risk as a discrete ground. It should have done. The Site lies in the River Ray catchment, on Oxford Clay, in an area where the Applicant's own sewerage undertaker has identified groundwater infiltration as a recurrent problem and where seasonal waterlogging is a recognised characteristic of the surrounding land.

13.2 The framework

13.2.1 Chapter 14 of the Framework requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, and that where development is necessary in such areas it should be made safe for its lifetime without increasing flood risk elsewhere. The sequential test and, where necessary, the exception test apply. Paragraph 173 requires a site-specific flood risk assessment for development in Flood Zones 2 and 3, for sites of one hectare or more in Flood Zone 1, and for sites at risk from other sources of flooding.

13.2.2 Site A exceeds one hectare. **A site-specific Flood Risk Assessment is therefore required irrespective of flood zone.**

13.2.3 Policies ESD 6 and ESD 7 of the adopted Local Plan address sustainable flood risk management and sustainable drainage systems. Oxfordshire County Council is the lead local flood authority.

13.3 Matters requiring assessment

13.3.1 PPC requests that a site-specific Flood Risk Assessment and drainage strategy be produced and published, addressing:

- flood risk from all sources, fluvial (River Ray and tributaries), surface water, groundwater, sewers and artificial sources, over the lifetime of the development, applying current climate change allowances for the relevant river basin district and the appropriate epoch, and, given the existing system's apparent state of disrepair, the cost and wider environmental impact of the remediation works needed to bring it into serviceable condition;
- the sequential test, applied by reference to the area of search appropriate to the development;
- the exception test if required;
- the existing surface water drainage regime for the Site, including the extent of existing impermeable area and its outfall;
- the proposed surface water drainage strategy, applying the drainage hierarchy, with infiltration testing given the Oxford Clay geology, and demonstrating restriction of discharge to greenfield or betterment rates;
- the interaction between the surface water strategy and the artesian groundwater conditions recorded beneath the Site, including the risk of mobilising contamination;
- the effect of the development on flood risk elsewhere, including downstream at Arncott Bridge and in the Ray floodplain;
- safe access and egress in flood conditions for a population of this size at a single access point;
- a flood evacuation and emergency response plan agreed with the Environment Agency and the emergency services; and
- the maintenance and adoption arrangements for any sustainable drainage features over the full operational life and beyond.

13.3.2 PPC further requests that the assessment address climate resilience more broadly, engaging Policy ESD 1 of the adopted Local Plan: overheating risk in the proposed accommodation, which is a material welfare consideration for occupants of institutional accommodation in summer conditions; water efficiency; and the energy strategy for the facility over a minimum ten-year operational life.

13.4 The position following publication of the application documents

Assessment against the ten matters at 13.3.1

13.4.2 PPC's position on each of the ten matters it asked a flood risk assessment and drainage strategy to address is as follows.

Matter requested at 13.3.1	Position
Flood risk from all sources over the lifetime of the development, applying current climate change allowances for the relevant river basin district and epoch	Sources assessed. **No climate change allowance, river basin district, epoch or development lifetime is stated in the Flood Risk Assessment.** The only allowance stated anywhere in the submission is 40 per cent, in the Drainage Design Statement, which then recommends at its paragraph 11.2 that the Applicant engage with the lead local flood authority "to determine whether the standard 40% allowance for climate change may be subject to reduction" on the basis of "the temporary nature of the development"
The sequential test, applied by reference to the appropriate area of search	**Not carried out.** Paragraph 3.1.10 records that "if the proposals can be designed such that development is located away from areas of surface water flood risk, it may not be necessary for the sequential test to be applied". The Planning Proposal Statement records at paragraph 2.13 that approximately 25 per cent of the Site has a high chance of surface water flooding, and the Drainage Design Statement confirms that Phase 1 accommodation is on the lowest part of the Site. The condition on which the test was to be avoided is not satisfied on the Applicant's own material
The exception test if required	The assessment concludes at paragraph 3.1.12 that, "given the site is located almost entirely within Flood Zone 1, the development would be considered appropriate with regards to flood risk and an exception test would not be required". PPC records that conclusion, and records that it is reached **without classifying the use proposed**: paragraph 3.1.11 classifies the **existing** use as "Less Vulnerable" and states only that "It is possible that any future development may be at a higher vulnerability". A residential institution is "More Vulnerable" under Annex 3 to the Framework, and approximately 0.16 hectares of the Site lies within Flood Zone 3
The existing surface water drainage regime, including impermeable area and outfall	**Not established.** The downstream routing "remains undetermined"; the outfalls are assumed; the network is described as non-operational; no CCTV survey has been carried out
The proposed strategy applying the drainage hierarchy, with infiltration testing given the Oxford Clay geology, demonstrating restriction to greenfield or betterment rates	Infiltration ruled out on desk-study grounds with **no BRE 365 testing.** Greenfield rates are **not** achieved in Phase 1, nor for a 440 sqm concrete drop-off area
The interaction with artesian groundwater conditions, including the risk of mobilising contamination	**Not assessed.** No groundwater monitoring has been carried out, and below-ground geocellular attenuation, pumping stations and a cesspool are proposed
The effect on flood risk elsewhere, including downstream at Arncott Bridge and in the Ray floodplain	**Not modelled.** The Drainage Design Statement records that further modelling "will be required" in order for hydraulic backwater effects at the discharge points to be understood
Safe access and egress in flood conditions for a population of this size at a single access point	**Not addressed**

Matter requested at 13.3.1	Position
A flood evacuation and emergency response plan agreed with the Environment Agency and the emergency services	**Not provided.** Neither the Environment Agency nor the emergency services has been consulted
Maintenance and adoption arrangements for sustainable drainage features over the operational life and beyond	**Not provided**, notwithstanding that Policy ESD 7 requires "an agreement on the future management, maintenance and replacement of the SUDS features"

The matter PPC places above all others under this ground

13.4.3 Phase 1 comprises 408 bedspaces, including 384 standard units and 24 medical isolation units. It is proposed on the existing northernmost hardstanding. The Drainage Design Statement identifies that hardstanding as "**the lowest part of the site**". It records that there is "**no suitable area for attenuation storage within Phase 1**", that "**flows from this area cannot be restricted to greenfield rates**", and that Phase 1 "will continue to drain in its existing manner using the current collection, conveyance and outfall arrangements", the position, line and level of which are "**currently unknown**". It assumes that "the existing drainage features are able to be brought up to a serviceable condition **having not been maintained for a considerable length of time**".

13.4.4 The same document records, following a site inspection on 25 February 2026, that formal drainage systems "have not been subject to routine maintenance for a considerable period and are therefore considered to be **non-operational**"; that the Ministry of Defence site team confirmed that this zone "**is prone to frequent surface water flooding**", attributed to the failure of two pumps which are out of operation and to blocked drains and gullies; and that on a clear, dry day "evidence of localised surface water flooding and ponding was observed in several areas".

13.4.5 That is a proposal to place the first 408 residents on the lowest and wettest part of the Site, through a drainage system the Applicant describes as non-operational, without attenuation, without a sequential test, without a flood evacuation plan, and without consulting either the Environment Agency or the lead local flood authority.

13.4.5A The Drainage Design Statement also asserts that post-development runoff rates are anticipated to be lower than existing conditions. PPC does not accept that assertion without further evidence: the proposal introduces substantial additional built form and hardstanding without a corresponding increase in soft landscaping, any increased runoff would discharge toward the Arncott SSSI and the tributaries of the River Ray, and the surrounding area, within the Upper Thames Clay Vales and partly within a designated flood plain, already experiences recurrent winter flooding.

13.4.6 The Flood Risk Assessment is not written for this development. Its stated purpose is "to support the consideration of future development"; it assesses 50.1 hectares against an application red line of 10.22 hectares; and it refers throughout to "any future development". It reduces the surface water risk rating from high to moderate by reliance on the Site's private drainage network, which its own drainage colleague describes as non-operational.

13.4.7 Two consents are identified in the Flood Risk Assessment as required and neither has been obtained: a Flood Risk Activity Permit for development within 8 metres of the Main River tributary or its defences, and Land Drainage Consent under section 23 of the Land Drainage Act 1991 for modifications to ditches or new outfalls. The document twice refers to the sewerage undertaker as "[the relevant service provider]", the placeholder unresolved. Sections 4.1 to 4.3 of the assessment,

containing its historic, fluvial and surface water flood risk analysis, contain no readable text in the version published.

13.4.8 PPC records that a Flood Risk Assessment and a drainage strategy have been produced; that the Site is almost entirely within Flood Zone 1 and is at very low risk of flooding from rivers and the sea; that attenuation designed to the 1 in 100 year event including a 40 per cent climate change allowance is proposed for Phases 2 and 3; and that the Strategic Flood Risk Assessment records no incidents of internal or external sewer flooding within the relevant postcode area.

13.4.9 A site-specific Flood Risk Assessment for the application site, assessing the development applied for, classifying its flood vulnerability under Annex 3 to the Framework and stating the climate change allowance, river basin district, epoch and development lifetime; the sequential test and, if required, the exception test; hydraulic modelling of the overland flow route and of backwater effects at the proposed discharge points; a CCTV survey of the existing network, infiltration testing to BRE 365 and groundwater monitoring; an attenuation solution for Phase 1 or a reasoned justification for its absence agreed with the lead local flood authority; a flood evacuation and emergency response plan with a demonstration of safe access and egress; a SuDS management, maintenance and replacement agreement as required by Policy ESD 7; and the substantive responses of the Environment Agency and of Oxfordshire County Council as lead local flood authority and SuDS Approving Body. PPC notes that no scheme design for any sustainable drainage feature has been published, so that neither their number, location nor effectiveness in mitigating flood risk can presently be assessed.

14. Ground 11: Public Health, Safeguarding and Social Impact

Status in Version 4.0	**STANDS AND IS STRENGTHENED. The full Operational Management Plan does not exist and awaits appointment of a service provider. Sections of the outline plan dealing with suicide and self-harm prevention, health and safety, handling a death at the Site and security contain no text. The Equality Impact Assessment engages with no case law, and in particular not with *TG and others*. Accommodation is proposed 45 metres from an unassessed sewage treatment works.**
Assessed at	Section 14.6 below

14.1 The basis on which PPC advances this ground

14.1.1 PPC states at the outset what this ground is not. It is not an argument that the people who would be accommodated at Site A present a risk to the surrounding community. PPC does not advance that argument, does not adopt it, and asks that it be disregarded if advanced by others.

14.1.2 This ground is advanced on the basis of the documented operational experience of comparable Home Office large sites, as recorded by the National Audit Office, the Committee of Public Accounts, the Home Affairs Committee, the Independent Chief Inspector of Borders and Immigration and the High Court. That evidence is directly relevant to two material planning considerations: the welfare of the people who would be accommodated at the Site, and the demands the facility would place on local statutory services.

14.1.3 The welfare of prospective occupants is a material planning consideration. It bears on whether the location is suitable for the use proposed, which is a question at the heart of the planning judgement.

14.2 The High Court's findings on large-site accommodation

14.2.1 In *TG and others v Secretary of State for the Home Department* [2025] EWHC 596 (Admin), handed down on 14 March 2025, Mould J determined four lead claims brought by asylum seekers accommodated at Wethersfield. PPC sets out the outcome with precision, including the respects in which the claimants did not succeed.

14.2.2 What succeeded.

- The claims of TG, MN and HAA succeeded in part. The Court held that the Secretary of State acted unlawfully in the exercise of her functions under sections 95 and 96 of the Immigration and Asylum Act 1999 in relation to their accommodation at Wethersfield, having failed properly to take into account evidence of their vulnerabilities. In HAA's case, the Court found that the decision of 15 January 2024 that Wethersfield remained adequate for his needs was unlawful, the Secretary of State having failed properly to take into account evidence from welfare officers, safeguarding referrals and a safeguarding manager's recommendation for immediate removal.
- In TG's case, the Court additionally found a breach of the duty to make reasonable adjustments under the Equality Act 2010.

- A **systemic** ground succeeded: the Court held that the Secretary of State had failed to assess the equalities implications when amending the asylum accommodation allocation policy, describing that as a most serious and inexplicable omission amounting to the clearest failure to fulfil the public sector equality duty in section 149 of the Equality Act 2010.

14.2.3 What did not succeed.

MJ's claim failed on all grounds. The Court found that, unlike the position in relation to Napier Barracks considered in *NB and others v Secretary of State for the Home Department* [2021] EWHC 1489 (Admin), the Secretary of State had remedied the deficiencies in the screening interview and ASF1 process. The remaining systemic and human rights grounds were rejected.

14.2.4 Why this matters here.

PPC advances two propositions, neither of which overstates the judgment.

(a) The risk of serious harm to vulnerable residents at a remote large site is judicially established as real and foreseeable, and materialised in three of four lead cases.

The Court had before it evidence including reports commissioned by the Home Office itself from the British Red Cross and from Management & Training Corporation, provided in February and May 2024, and correspondence from the Independent Chief Inspector of Borders and Immigration dated 20 December 2023 and 9 February 2024 raising concerns following inspection visits. That is not campaigning material; it is the Home Office's own commissioned evidence and its own inspectorate.

(b) The PSED finding is directly transferable.

The failure found was a failure to assess equalities implications when changing allocation policy. The present proposal will require allocation decisions of exactly the kind at issue. The Secretary of State determining this application is subject to section 149 in his own right (Section 17).

14.3 The published record on operational experience at comparable sites

14.3.1 PPC relies on the following published findings, each from an authoritative independent source.

- The Independent Chief Inspector of Borders and Immigration's inspection of contingency asylum accommodation covering the period November 2023 to June 2024 found that the quality of accommodation across the estate is highly variable and that too many people seeking asylum continue to be placed in accommodation that is inadequate or deeply unsuitable.
- The Home Affairs Committee's report *The Home Office's management of asylum accommodation* (HC 580, 2025) concluded that there are too many cases where asylum accommodation is not of an adequate standard and where safeguarding concerns relating to vulnerable people have not been addressed; that the Government's approach to delivery has led to accommodation being distributed unevenly, putting pressure on local services and creating or exacerbating community tensions; and that opaque and complicated subcontracting arrangements have had a negative impact on delivery.
- The National Audit Office's report on the Home Office's asylum accommodation contracts (HC 874, 7 May 2025) recorded that the Home Office has established a hub to gather data on safeguarding incidents but does not systematically collect data on outcomes; that the contracts do not specify performance deductions related to safeguarding outcomes; and that the safeguarding hub receives up to 4,000 referrals a week across the estate.

- Braintree District Council, as local planning authority for Wethersfield, has publicly described the location as unsuitable by reason of its isolation and the lack of capacity in local services.
- At Manston, a diphtheria outbreak occurred in 2022 and a resident, Hussein Haseeb Ahmed, died. A non-statutory inquiry, chaired by Sophie Cartwright KC, is now investigating that death. This is among the most serious documented outcomes at any site in the wider programme and speaks directly to the public health risks of large-scale congregate accommodation.

14.3.2 PPC's earlier draft cited specific incident figures drawn from the NAO's March 2024 investigation. Those figures have been removed from this Version 2.0 pending verification against the primary source, and are recorded at Appendix F. PPC does not consider the ground weakened by their removal: the findings summarised at 14.3.1 are sufficient, and are drawn from the reports' own conclusions.

14.4 What follows for this application

14.4.1 PPC does not submit that these matters are determinative in themselves, nor that the operational shortcomings recorded elsewhere will necessarily be replicated. PPC submits that they establish four propositions material to the planning judgement:

- **Remote, large-scale, self-contained accommodation of this model carries a documented and foreseeable risk of welfare harm.** Isolation, absence of meaningful activity, difficulty of access to services and the institutional character of the accommodation are recurrent themes in the independent evidence. Those are, in substantial part, **locational** characteristics, which is to say, planning characteristics.
- **The interface with local statutory services is greater in practice than the "self-sufficiency" model predicts.** That was the 2003 Inspector's conclusion and it is the conclusion of the contemporary independent evidence.
- **Oversight and enforceability are weaker than in conventional development.** Safeguarding outcomes are not systematically measured; subcontracting arrangements are opaque. The decision-maker should not assume that operational assurances given at application stage will be capable of enforcement over a minimum ten-year period.
- The Government's own stated policy tells against sites of this character near facilities used by children. The Home Secretary has stated a policy against locating asylum accommodation near schools and nurseries. That policy is being applied to RAF Linton-on-Ouse, a sister site in the same three-site 2026 programme. PPC invites the decision-maker to apply the same policy consistently here, given the community facilities and family use in the immediate vicinity of Site A.

14.4A The specific welfare risks of this model at this location

14.4A.1 PPC sets out below the specific mechanisms by which the proposed model is liable to cause welfare harm. Each is a locational and design characteristic, and therefore a planning matter, not a matter of operational detail alone.

14.4A.2 **Vulnerability that screening does not reliably identify.** Home Office guidance accepts that vulnerable individuals should be identified and placed in suitable accommodation rather than on a large site. In practice, screening does not reliably identify many of those who are vulnerable — including survivors of torture, victims of trafficking, people with serious mental illness, and those at risk on grounds of sexuality or gender identity. A model that assumes vulnerability will be screened out therefore rests on a premise the evidence does not support.

14.4A.3 **Isolation and indeterminate stay.** The Site is remote from services and social contact. The documented harm at comparable sites arises not from isolation alone but from isolation combined with an indeterminate length of stay. The proposal carries a stated minimum ten-year operational life and no published maximum stay for any individual. That is the precise combination the independent evidence identifies as harmful.

14.4A.4 **Institutional character.** High perimeter security and surveillance give the Site the character of a place of detention. For people who have previously experienced detention or persecution, that character is itself capable of re-traumatising, and of deterring engagement with health and welfare services on site.

14.4A.5 **Living conditions and mental health.** Where accommodation is shared at density, with limited privacy and disturbed sleep, the recorded consequence at comparable sites is a deterioration in mental health, with a raised incidence of self-harm and suicide. The British Red Cross has reported that these are not remote risks but observed outcomes at large sites. PPC does not assert what the living conditions at Site A would be; it submits that they cannot be assessed at all until the Applicant states the maximum capacity and the accommodation standard proposed.

14.4A.6 **Safeguarding of occupants from exploitation.** A large, under-occupied population with little to do, minimal income and weak oversight is an environment in which exploitation, coercion and the formation of controlling groups are known to occur. The applicable weekly personal allowance for a resident in full-board accommodation is £9.95, from which all personal items beyond food and lodging must be met. That degree of dependence is itself a recognised risk factor for exploitation. Where a resident has previously been trafficked, the risk is of re-trafficking; the National Referral Mechanism imposes a positive duty to identify and protect such individuals, and the adequacy of that protection on a site of this scale must be demonstrated, not assumed.

14.4A.7 **The statutory safeguarding duty.** Section 55 of the Borders, Citizenship and Immigration Act 2009, and the Home Office's wider safeguarding obligations, apply to the people who would be accommodated. The independent evidence records that safeguarding on the asylum accommodation estate is not systematically inspected, regulated or enforced, and that outcomes are not measured. The decision-maker should not assume that safeguarding assurances given at application stage will be capable of enforcement over the intended operational life.

14.4A.8 **Provision for religious observance.** The occupants are likely to hold a range of faiths. Experience at comparable sites is that a single multi-faith room does not meet that need at this scale, and that inadequate provision itself contributes to tension and to a decline in wellbeing. Provision for religious observance proportionate to the stated capacity should be assessed before determination.

14.5 Consultation and evidence requested

14.5.1 PPC requests that, before any decision, the Applicant be required to demonstrate direct engagement with, and where possible the agreement of:

- **NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board** - on primary care, mental health service capacity, and safeguarding and clinical pathways for residents;
- **Oxfordshire County Council** - in its capacities as adult and children's safeguarding authority, public health authority and social care authority;
- **Thames Valley Police** - on community safety planning and resourcing;
- **Oxfordshire Fire and Rescue Service and South Central Ambulance Service** - on response and evacuation;
- **Cherwell District Council** - in its environmental health, housing and community safety capacities; and
- **the affected parish councils**, on the practical local interface.

14.5.2 PPC further requests publication of the proposed multi-agency forum arrangements, the incident reporting and escalation protocol, the safeguarding policy that would apply, and the mechanism by which local partners would be able to raise and resolve operational concerns over the intended operational life.

14.6 The position following publication of the application documents

The operational parameters now disclosed

14.6.1 The Outline Operational Management Plan at Section 4 of the Planning Proposal Statement, the Equality Impact Assessment and the Secretary of State's written statement together disclose the following.

Parameter	Position disclosed
Capacity and phasing	1,256 bedspaces in three phases of 408, 216 and 632, including 64 medical isolation units
Cohort	Single adult males aged 18 to 65, allocated under the Allocation of Asylum Accommodation policy
Length of stay	"occupancy likely set at 90 days"; the Equality Impact Assessment records that a maximum length of stay "may be imposed… however, this will be subject to confirmation through Business Design and operational planning"
Staffing	Approximately 130 staff, being 108 on day shift and 22 on night shift, for up to 1,256 residents
Ablutions	"Shared ablutions at a ratio of 1 to 5"
Catering	Full board, three meals per day, from a kitchen and dining facility "with capacity for approximately 350 SUs at any one time"
Healthcare	A medical centre comprising eight consulting rooms; "space for the provision of healthcare (primary care and infectious disease management)"
Religious observance	A single multi-faith facility, accessible 24 hours
Recreation	Paragraph 4.23 of the Planning Proposal Statement lists the recreational facilities to be provided; the list consists of a single empty bullet. A recreation building is identified in Phase 1 and a gym in Phase 2
Personal allowance	Not stated in the submitted material
Operational Management Plan	**Does not exist.** To be prepared "following the appointment of the Service Provider(s)". No service provider is named
Suicide and self-harm prevention; health and safety; handling a death at the site; security	The corresponding paragraphs of the Planning Proposal Statement (4.46 to 4.53 and 7.57 to 7.61) contain no text
Disability	The Equality Impact Assessment records that the Site and rooms are not adapted for those with particular accessibility needs; inclusive design "is ongoing and is to be finalised at the detailed design stage"
Engagement	An Operational Working Group "transitioning to Multi-Agency Forums"; no substantive response from any health, police, fire or ambulance body is submitted

PPC's four submissions

14.6.2 (a) The welfare parameters cannot presently be assessed, because the operational document does not exist. Paragraph 14.4A.5 stated that living conditions "cannot be assessed at all until the Applicant states the maximum capacity and the accommodation standard proposed". The capacity is now stated, and PPC records that. The accommodation standard is stated only in outline, and the document which would set out how the Site is to be run will not be written until a contractor has been appointed. The decision-maker is therefore asked to grant permission for a ten-year facility for 1,256 people on the basis of an outline plan several of whose sections, including those on suicide and self-harm prevention and on handling a death at the Site, contain no text.

14.6.3 (b) The Equality Impact Assessment does not engage with the leading authority. PPC has identified no citation of any authority in the assessment, and in particular no citation of *TG and others v Secretary of State for the Home Department* [2025] EWHC 596 (Admin), in which the High Court found a systemic breach of section 149 of the Equality Act 2010 in relation to the very allocation policy which would govern placements at this Site. That is the most directly relevant authority there is, and it is not addressed. The assessment's evidence base is national asylum statistics and internal Home Office policy; PPC has identified no demographic or equality evidence about the receiving community and no protected-characteristic analysis of the effect on existing residents. The assessment is stated to be subject to review "six months from date given below", and its publication status is recorded as "Not decided yet". See further Section 17.3.

14.6.4 (c) The application confirms the isolation on which the independent evidence turns. The Applicant's own material records that there is no pedestrian infrastructure serving the Site; that the nearest bus stops cannot be reached on foot; that no car parking is proposed for residents; that seven or eight cycle spaces are proposed for 1,256 residents and 130 staff; and that access to off-site facilities is by minibus provided by the Home Office. Paragraph 14.4A.3 identified isolation combined with an indeterminate length of stay as the combination the independent evidence identifies as harmful. The stated occupancy is "likely set at 90 days", subject to confirmation.

14.6.5 (d) One new welfare matter arises from the application itself. The Drainage Design Statement records that in later phases "the residential and welfare units are intended to be approximately **45 m** from the WwTW", against a standard odour boundary the same document gives as approximately **250 metres**, and that "An odour impact assessment will need to be undertaken". None has been. PPC does not consider that accommodation 45 metres from an unassessed sewage treatment works can properly be described as the fit-for-purpose facility the Applicant's own conclusions claim, and invites the Secretary of State to require the odour and noise modelling before rather than after determination. This is developed as Ground 13 at Section 15A.1.

14.6.6 PPC records that an Equality Impact Assessment has been produced and addresses all nine protected characteristics; that medical isolation units are provided for the containment of infectious and communicable diseases, which is a direct response to one of the risks identified at 14.3.1; that a 24-hour multi-faith facility is proposed; that Migrant Help is contracted to deliver advice, issue reporting and eligibility services 24 hours a day; that private space is to be available for meetings with legal representatives; and that a suitability assessment is to be undertaken before any individual is transferred to the Site.

14.6.7 Substantive responses from each of the six bodies identified at 14.5.1; the maximum length of stay and how it is to be secured; a complete Outline Operational Management Plan with no missing sections, and the mechanism by which the full Operational Management Plan and its successors would be controlled over the operational life; an Equality Impact Assessment which addresses the receiving community by protected characteristic and engages with *TG and others*; and odour and noise modelling for the proposed wastewater treatment works at the separation distances proposed for each phase.

15. Ground 12: Need, Alternatives, Deliverability and Value for Money

Status in Version 4.0	**STANDS. The Statement on National Importance considers alternative procedural routes; PPC has identified no consideration of alternative sites, no site selection methodology and no value for money analysis anywhere in the submission. None of the six items requested at 15.4.1 is provided. There are "no definitive plans for the decommissioning phase".**
Assessed at	Section 15.5 below

15.1 The correct legal framing of the alternatives argument

15.1.1 PPC's earlier draft advanced an alternative-sites argument without addressing the leading authority, which is adverse to it. PPC corrects that here, because a representation that does not confront adverse authority is of no assistance to the decision-maker.

15.1.2 The general position is as stated by Laws LJ in *R (Jones) v North Warwickshire Borough Council* [2001] EWCA Civ 315 at [30]: consideration of alternative sites will be relevant to a planning application only in exceptional circumstances, which will particularly arise where the proposed development, though desirable in itself, involves on the site proposed such conspicuous adverse effects that the possibility of an alternative site lacking such drawbacks itself becomes a relevant planning consideration. The examples given by Simon Brown J in *Trusthouse Forte Hotels Ltd v Secretary of State for the Environment* (1986) 53 P&CR 293 were airports, coalmining, petro-chemical plants, nuclear power stations and gypsy encampments.

15.1.3 In *R (Cherwell District Council) v First Secretary of State* [2004] EWHC 724 (Admin) at [26], Collins J doubted whether an accommodation centre necessarily falls within that category, and upheld the Inspector's conclusion that identification of alternative sites would have been a virtual impossibility. PPC accepts that this is adverse authority on closely comparable facts.

15.1.4 PPC therefore does **not** advance a freestanding common law alternative-sites objection. It advances four distinct arguments, each of which stands on a different legal footing and none of which is answered by *Jones*.

(a) Alternatives are an express component of the statutory urgency test.

PPG Paragraph 027 requires the applicant to demonstrate that the development must be operational to a timeframe **"unlikely to be feasible using other application routes, including Crown Development"**. That is a mandatory comparative exercise directed by guidance. It concerns alternative *procedural routes*, and it must be evidenced. *Jones* has nothing to say about it.

(b) Alternatives are a mandatory component of an Environmental Statement.

Regulation 18(3)(d) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 requires an environmental statement to include a description of the reasonable alternatives studied by the developer which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment. If the application is EIA development, alternatives must be described as a matter of law.

(c) Alternatives are relevant to the weight to be given to the asserted benefit.

Where the benefit relied upon is the provision of a fungible national commodity, accommodation places, the weight properly attaching to the delivery of those places at *this* site is affected by the availability of other means of delivering them. That is not an alternative-sites objection; it is an assessment of the weight of the benefit side of the planning balance, which is a matter for the decision-maker in the ordinary way.

(d) Deliverability is a material consideration in its own right.

Whether the development is capable of being delivered, and delivered within the timescale said to make it urgent, is material both to the urgency certification and to the weight of the asserted benefit.

15.2 The published record on large-site deliverability and value for money

15.2.1 The following are matters of published record from the National Audit Office and parliamentary committees, and PPC relies on them as evidence bearing on deliverability and on the weight to be given to the asserted benefit.

Finding	Source
The Home Office's Large Sites Accommodation Programme was expected to cost **£1.2 billion**	NAO, *Investigation into asylum accommodation*, 20 March 2024
Set-up costs at the two former RAF bases were originally estimated at **£5 million each**, but rose to approximately **£49 million (Wethersfield)** and **£27 million (Scampton)**	NAO, March 2024
By the end of March 2024 at least **£230 million** had been spent developing four large sites, which at the end of January 2024 were housing approximately **900 people**	NAO, March 2024
Value-for-money assessments concluded large sites would be around **£153 million cheaper** than hotels; the Home Office subsequently expected them, with sunk costs included, to cost approximately **£46 million more** than hotels over the same period	NAO, March 2024
The Home Office **lowered** its expectations both for how many people future sites would accommodate and for the number of beds, moving to sites accommodating **between 200 and 700 people each, rather than more than 1,000**	NAO, March 2024
Internal assurance reviews of the plans were rated **"red"**	NAO, March 2024
The Home Office's approach to setting up large sites at speed led to "unacceptable and avoidable mistakes" and a failure to protect value for money	Committee of Public Accounts, 2024
Scampton was cancelled in September 2024 after the Home Office concluded the site was not value for money	Home Affairs Committee, HC 580, 2025
The **Northeye estate at Bexhill**, purchased for **£15.4 million** in September 2023, was ultimately deemed unsuitable and is to be sold or transferred	Home Affairs Committee, HC 580, 2025
Of four "pathfinder" large sites, only two opened, and only Wethersfield remains in operation	Home Affairs Committee, HC 580, 2025
The **Bicester Accommodation Centre** programme was cancelled in June 2005 after approximately **£28 million** had been spent; local opposition elongated the planning process, delayed the start on site by **fourteen months** and contributed to the scheme becoming uneconomic	NAO, *Home Office: The cancellation of Bicester Accommodation Centre*
Linton-on-Ouse was abandoned in August 2022 when the Ministry of Defence withdrew the offer of the site	Published correspondence, Home Office Director for Asylum Accommodation Centres, October 2022
Cameron Barracks was ruled out in June 2026 following detailed assessments	Ministerial statement, 25 June 2026

15.2.2 PPC draws attention in particular to the NAO's finding that the Home Office moved away from sites accommodating more than 1,000 people towards sites accommodating between 200 and 700. The present proposal, at a reported 1,200 to 1,250 places, reverses that direction. The Applicant should be required to explain the evidential basis for that reversal.

15.2.3 PPC records that these matters are relied upon not as criticism of the Applicant for its own sake, procurement and expenditure are not, in themselves, planning considerations - but for two properly planning purposes. First, they bear on **deliverability**, which is material to whether the asserted urgent benefit will in fact be realised. Second, they bear on the **weight** to be attached to the asserted benefit, which cannot be assumed to be secured merely because permission is granted.

15.3 The wider policy trajectory

15.3.1 The Government's stated objective is to end the use of asylum hotels within this Parliament. On the Minister's own account, hotel use has more than halved from its peak and continues to fall. Expenditure on asylum accommodation and support has fallen from its 2023-24 peak.

15.3.2 PPC submits that the case for committing to a minimum ten-year, capital-intensive large site, a commitment extending well beyond the Government's own target date for ending the underlying policy driver, has not been made out on published evidence, and requires specific, current and transparent demand evidence across the full intended operational life.

15.4 Evidence requested

15.4.1 PPC requests that the following be produced and published before determination:

- the site selection methodology applied, the sites considered, the criteria applied and the reasons for preferring Site A;
- the current value-for-money or cost-benefit analysis for Site A, including the comparator against which it is assessed and the sensitivity of the conclusion to occupancy assumptions;
- the assumed capacity of the Site, the phasing profile and the assumed occupancy over the intended operational life;
- the procurement route for the operating contract, its intended duration and its break provisions;
- the assessed consequence of determination under the standard route rather than the urgent route, expressed in months and in accommodation places; and
- the position at the end of the intended operational life, including whether restoration is proposed and how it would be secured.

15.4.2 PPC has made requests under the Freedom of Information Act 2000 and, where applicable, the Environmental Information Regulations 2004, directed to the Home Office, the Ministry of Defence and the Cabinet Office, in respect of several of these matters. The requests, their status and their relationship to the grounds of objection are recorded at Appendix F. PPC will supply the responses as supplementary evidence and requests that the determination remain open to receive them for as long as the statutory procedure permits.

15.5 The position following publication of the application documents

What the application discloses

15.5.1 The Statement on National Importance contains a section headed "Alternatives Considered and Need for Urgent Determination: Why Urgent Crown (not non-urgent Crown or Class Q) is necessary for Bicester". It considers alternative **procedural routes** only.

15.5.2 Of PPC's four arguments at 15.1.4, the first is addressed but not evidenced in the form requested (Section 5.8); the second does not arise, because the screening direction means there is no environmental statement and therefore no obligation under regulation 18(3)(d) of the 2017 Regulations; and the third and fourth are not addressed at all.

15.5.3 None of the six items requested at 15.4.1 has been provided. There is no site selection methodology, no statement of the sites considered or the criteria applied, no value for money or cost-benefit analysis, no statement of the procurement route or contract duration, and no position at the end of the operational life. The Secretary of State's written statement records that "**There are no definitive plans for the decommissioning phase** of the Proposed Development within an expected timeframe."

15.5.4 The Applicant addresses the alternative sites point directly, at paragraph 6.9 of the Planning Proposal Statement: "The earlier planning history is material because it demonstrates that the Site has previously been found to be suitable in principle for immigration accommodation and that alternative site analysis was not considered necessary in those circumstances." PPC's response is at 7.8.7 and 7.8.8 and is not repeated.

15.5.5 On deliverability, PPC relies on the Applicant's own consultants. The drainage viability "has not been determined"; the existing electrical infrastructure "cannot be relied upon"; ground conditions "remain unverified"; the utilities proposals "remain illustrative"; nine ecological surveys are outstanding; and the topographical survey is unfinished. A benefit contingent on deliverability which is not established attracts reduced weight, as PPC submits at 18.2.1(c).

15.5.6 PPC records one candid admission in the Statement on National Importance which bears on this ground. In explaining why a Special Development Order is not pursued, the Statement refers to "previous Home Office experience where an SDO approach was withdrawn and replaced by an Urgent Crown submission". That is consistent with the pattern of large-site programme abandonment recorded at 15.2.1.

15.5.7 PPC records that the Statement does undertake a reasoned comparison of the available procedural routes, and that its explanation of why a Special Development Order and reliance on Class Q are not pursued is a proper one which PPC does not dispute on its own terms.

15.5.8 Each of the six items at 15.4.1, together with the position at the end of the operational life, including whether restoration is proposed and how it would be secured.

15A. Grounds 13 to 16: Matters Arising From the Submitted Application

15A.0.1 Four matters disclosed by the submitted material were not, and could not have been, anticipated in. PPC advances each as a further ground.

15A.1 Ground 13: The proposed on-site wastewater treatment works

15A.1.1 The application proposes the construction on Site A of a wastewater treatment works of 3,105 square metres, together with a pumping station of 359 square metres, serving a design population of 1,386 persons and discharging treated effluent to a watercourse. That is approximately 17 per cent of the total proposed floorspace of 17,935 square metres. It appears in the description of development as "waste water treatment plant" and receives no assessment in the Planning Proposal Statement's planning case.

15A.1.2 The following are all drawn from the Applicant's own Drainage Design Statement.

- **The selection was made by default.** "Whilst Approach 1 is the preferred, **Approach 3 was selected for the RIBA 2 approach as there is not enough information to confirm the feasibility of the other approaches**."
- **No outfall has been identified.** "At present, **there are no apparent watercourses that seem suitable for discharge within the curtilage of the site** at MOD015. Depending on the distance to the nearest outfall location, third-party land negotiations, and pipe routing the installation and operation of the on-site treatment works may be impacted." Three options are considered and are **redacted in their entirety** from the published document. "At this stage it is not possible to determine which of the above options is the most appropriate... It should be noted that the watercourses mentioned above have been located during a **desktop study only**."
- **No environmental permit has been applied for.** The report records that a new permit is required under the Environmental Permitting Regulations 2016 and the Urban Wastewater Treatment Regulations, and warns that permitting "can take time where modelling and specialist studies are required prior to submission and following submission application determination may be subject to delays relating to statutory public consultation... extended determination timescales where additional assessment is required, including assessment of impacts on receiving waters, **compliance with Water Framework Directive objectives, Habitats Regulations considerations**, or where proposals attract a higher level of public interest."
- **No Water Framework Directive compliance assessment has been carried out**, notwithstanding that the Applicant's own report identifies it as a matter which may be required.
- **No odour impact assessment has been carried out.** "A standard odour boundary from a WwTW is ~250m from the source of odour... Given the potential proximity of domestic and welfare facilities to the WwTW, odour control will likely be required on-site as mitigation. **An odour impact assessment will need to be undertaken.**" Phase 1 separation is approximately 100 metres; in later phases "the residential and welfare units are intended to be approximately **45 m** from the WwTW".
- **No noise assessment of the works has been carried out.** Applicable limits are given as 40 dB(A) at the site boundary and 80 dB(A) in the plant room. The Noise Technical Note assesses road traffic noise into the Site and does not model plant.

- **An existing community facility lies within the envelope.** "Launton FC - Bicester Garrison Sports Ground to the west of the site, is approximately **130 m** from the intended WwTW location. It will be necessary to ensure the receptors at this facility are not impacted by odour or noise." That is the facility identified at 8.4.1A, used by children and families.
- **The process, footprint and sludge strategy are undefined.** "Although the exact treatment conditions have not been defined, an allowance of 50m x 50m has been provided in the masterplan… However, dependent upon the final levels of treatment agreed, compact units may be required to limit the process plant to this footprint." A sludge management strategy, a chemical dosing strategy including bunding, a control philosophy and instrumentation, frost protection and a phasing strategy are all listed as matters for the next design stage.
- **The interim solution is conceded not to be viable at capacity.** "Initially the foul arisings can be tankered off-site, assuming that a receiving WwTW is found with sufficient capacity, however **this is not a viable option for the total number of SUs ultimately anticipated**." Phase 1 "may be served by a cesspool, with the waste being tankered away. Although this will require a municipal works to take the waste". No assessment of the resulting heavy goods vehicle movements on the B4011 appears in the Transport Assessment.

15A.1.3 PPC's submission. A sewage treatment works of this scale is, in ordinary circumstances, development in its own right, requiring its own assessment, its own odour and noise modelling, its own permit and its own consideration of alternatives. Here it is proposed as an incident of an accommodation scheme; its location is fixed only as a 50 metre square allowance on a masterplan; its outfall is unknown; its permit is unapplied for; its process is undefined; its odour and noise envelope encompasses both the accommodation it serves and an existing community sports ground; and it was not before Natural England when Natural England advised on the effect of the development on a downstream Site of Special Scientific Interest.

15A.1.4 PPC submits that this element alone warrants the exercise of the power at PPG Paragraph 057, and that it is a substantial reason for revisiting the screening direction (Section 16.6).

15A.2 Ground 14: On-site electricity generation

15A.2.1 The Utilities and Infrastructure Assessment states that the estimated maximum demand is approximately 2.16 MVA; that "the condition, capacity and configuration of this network are currently unknown"; that "The capacity of the primary intake, along with the location and ratings of existing distribution points, transformers and substations, has not been verified at this stage"; and that "**Due to the current uncertainties regarding available power within the network, the current proposal assumes that the existing electrical infrastructure cannot be relied upon, and therefore temporary and/or permanent generator provision shall be incorporated to support the development.**"

15A.2.2 The Secretary of State's written statement confirms that a "generator compound" forms part of the Phase 1 infrastructure and that a further generator compound is provided in Phase 2. There is no gas supply and none is proposed, so all space heating, hot water and cooking for 1,256 residents and 130 staff must be electrical.

15A.2.3 No assessment of that generation appears anywhere in the submission:

- The Air Quality Screening Technical Note assesses road traffic emissions and construction dust. It records that "baseline and operation phase dispersion modelling has not been undertaken" and that "no sensitive receptors have been selected". It contains no assessment of point-source combustion emissions.
- The Noise Technical Note assesses road traffic noise into the Site. It does not model generator noise.
- No fuel storage, bunding, delivery or spill containment arrangements are described, on a site over a Secondary A aquifer, within a Drinking Water Safeguard Zone and a Nitrate Vulnerable Zone. PPC separately notes the factsheet's stated on-site potable water storage requirement of 90 litres per person, which for up to 1,250 occupants equates to some 113,000 litres before any additional requirement for staff; it requests confirmation of how that volume would be stored, how water quality would be maintained in storage, and, if supply is ultimately to be by external connection, of the impact on capacity available to existing users and to planned local housing development (see also 9.3.2).
- No assessment of the carbon consequences appears, notwithstanding Policies ESD 1 and ESD 2 and the absence of any energy statement (7.8.4).
- The scale and duration of the generation, whether temporary, permanent or both, is not stated.

15A.2.4 PPC requests that the Applicant state the proposed generating capacity, its fuel, its expected running hours, its emissions and its noise output, and that air quality and noise assessments be carried out accordingly, before determination.

15A.2.5 PPC also asks what use will be made of on-site renewable generation, such as solar or wind, to reduce reliance on the generator provision addressed above, including for the vehicle fleet used to transport residents to and from the Site, so as to reduce both grid demand and vehicle emissions.

15A.3 Ground 15: The contradiction between the temporary use applied for and the permanent use described

15A.3.1 The application is for a temporary change of use for ten years. That is stated at paragraphs 1.3, 1.6 and 3.1 of the Planning Proposal Statement and in the description of development.

15A.3.2 Four documents submitted in support of the same application say something different.

- The **Statement on National Importance** states that its purpose is to explain the planning route "**to secure long-term operation**"; that "Over time however, it is intended that the site will subsequently be **expanded for use as a long-term asylum accommodation solution**"; and that the development will provide "an initial minimum viable product (MVP) capacity followed by phased expansion to **full long-term operational capacity**". It rejects reliance on Class Q because that route "would not align with the need for Bicester to operate as a **long term, sustainable** component of the asylum accommodation estate, and it would not provide the necessary certainty for **permanent infrastructure solutions**".

- The **Secretary of State's written statement on screening** records: "The duration of operational phase is not specified but will be subject to review after an initial 10-year period... at a minimum, the Proposed Development is expected to operate for 10 years with the potential for this to be extended... There are no definitive plans for the decommissioning phase... **For the purpose of this EIA screening, it is assumed that the Proposed Development operates permanently as a worst case scenario.**"
- The **Transport Assessment** records at its paragraph 1.3.3 that the proposal is "for temporary use, initially for a period of ten years (**facilities are being designed to operate for longer in case use beyond ten years is required**)".
- **Paragraphs 5.84 to 5.88 of the Planning Proposal Statement** request the retention of permitted development rights under eleven Parts of Schedule 2 to the General Permitted Development Order 2015, including Classes A, B, C, D, K, Q, QA, R, S and T of Part 19, expressly to give "flexibility in the future to undertake small scale development projects not foreseen at the time of the submission of the planning application".

15A.3.3 This is not a drafting inconsistency. It determines the answer to at least six substantive questions.

Question	If the use is temporary for ten years	If the use is long-term or permanent
Biodiversity net gain	The five-year temporary development exemption does not apply, so the full 10 per cent obligation arises	The obligation arises equally, and the case for on-site delivery and 30-year management is stronger
Flood risk lifetime and climate change allowance	The Drainage Design Statement recommends approaching the lead local flood authority to seek a reduction of the 40 per cent allowance "Given the temporary nature of the development"	No reduction could be justified, and a longer epoch allowance would apply
Urgency	A ten-year commitment is already a long-term estate decision rather than an emergency response (5.3.2(a))	The case for the urgent route is weaker still: this is a strategic estate acquisition
Restoration	A restoration condition and decommissioning scheme would be expected	None is proposed, and the Applicant confirms there are "no definitive plans for the decommissioning phase"
Permitted development rights	Wide retained rights are difficult to justify for a bounded temporary use	Wide retained rights would allow the facility to grow and change without further assessment
The EIA screening	A ten-year use is what the application seeks	The screening was carried out on the assumption of permanent operation, which is a different development from the one applied for

15A.3.4 PPC further observes that the classes of permitted development right sought are not confined to small-scale matters. Class Q of Part 19 is development by the Crown relating to an emergency; Class R is the erection of gates and fences for national security purposes; Class S is closed circuit television cameras for national security purposes; Class T is electronic communications apparatus for national security purposes; and Class C is development on operational Crown land. Those are precisely the classes which would permit the perimeter treatment, the surveillance infrastructure and the extent of the developed area to be altered after permission, without further application, on a site for which no lighting assessment, no landscape masterplan, no boundary treatment detail and no landscape and visual impact assessment to GLVIA3 has been provided.

15A.3.5 PPC requests that the Applicant state unambiguously what it applies for; that any permission be limited by condition to a defined period with a restoration scheme secured; and that permitted development rights under Part 19 of Schedule 2 to the General Permitted Development Order 2015 be removed in respect of the application site.

15A.4 Ground 16: The extent of the reliance placed on planning conditions

15A.4.1 The Applicant expressly proposes that the following be secured by planning condition, by detailed design, or at RIBA Stage 3.

Matter	Mechanism proposed	Reference
The lighting scheme in its entirety	Pre-commencement condition	Planning Proposal Statement 7.21
The foul and surface water drainage strategy in its entirety, including implementation	Pre-commencement condition	7.80
The longer-term power generation solution and the foul and surface water drainage requirements	Pre-commencement condition	7.78
Further contamination assessment by targeted sampling in areas of made ground and where munitions were handled and stored	Pre-commencement condition	7.54
Feasibility assessment for combined heat and power and district heating	Pre-commencement condition	7.48
Feasibility assessment for on-site renewable energy	Pre-commencement condition	7.51
Arboricultural Impact Assessment	Planning condition	7.45
Archaeological monitoring and the Written Scheme of Investigation	Planning condition	7.27-7.28
All protected species mitigation, following nine outstanding surveys	Detailed design	7.34-7.35
Inclusive and accessible design	Detailed design	3.15
Energy efficiency measures and building orientation	Detailed design	7.50
Detailed escape distances, structural fire resistance and space separation	Detailed design and Building Control	7.74-7.75
The Operational Management Plan in full	After appointment of the service provider	4.1
The Construction Traffic Management Plan	Later agreement with the highway authority	Transport Assessment 5.2.4-5.2.7
Odour and noise impact assessment and mitigation for the wastewater treatment works	RIBA Stage 3	Drainage Design Statement 9.6
Hydraulic modelling, CCTV survey, ground investigation, infiltration testing, outfall identification and permitting	RIBA Stage 3	Drainage Design Statement 11.2

15A.4.2 PPC does not object to the use of conditions. Conditions are the ordinary means by which detail is controlled once the principle and the parameters of a development have been settled. PPC objects to the use of conditions to settle the principle.

15A.4.3 The distinction is illustrated by drainage. A condition requiring approval of a detailed design, within a strategy already shown to be deliverable, is unobjectionable. A condition requiring the submission of a strategy whose viability the Applicant's own consultant says "has not been determined", where the outfall has not been identified, where the receiving watercourse is not known to be suitable, where the permit has not been applied for and where the sewerage undertaker has not been asked whether it has capacity, is different in kind. It does not control the detail of a solution; it substitutes for the demonstration that a solution exists.

15A.4.4 The same analysis applies to contamination. A condition requiring implementation of a remediation scheme, following an intrusive investigation which has established what is present, is standard. A condition requiring the intrusive investigation itself, in order to establish for the first time whether the Site is suitable for 1,256 people to live and sleep on, is not. Paragraph 189 of the Framework requires the decision-maker to be satisfied that the site "is suitable for its proposed use taking account of ground conditions". That is a matter for the decision, not for its aftermath.

15A.4.5 And it applies to ecology, for the reasons at 10.5.2 and 10.6.8.

15A.4.6 There is a further and practical point arising from the procedure the Applicant has chosen. Under the urgent Crown Development route there is no Inspector, no hearing and no inquiry. If the substantive technical matters are deferred to the discharge of conditions, they will never be examined by any independent decision-maker at any stage; and the consultees whose expertise bears on them have no guaranteed statutory entitlement to be consulted, because the application has been screened as non-EIA development. **The combination of the urgent route, a negative screening direction and comprehensive reliance on conditions removes the substance of this proposal from scrutiny altogether.**

15A.4.7 PPC does not ask the Secretary of State to refuse to impose conditions. It asks that the information be required now, under Planning Practice Guidance Paragraph 057, so that the conditions imposed are conditions of detail rather than conditions of principle.

PART D - CROSS-CUTTING MATTERS, BALANCE AND RELIEF

16. Environmental Impact Assessment: Screening and Scope

16.1 Why screening is the pivotal decision in this case

16.1.1 Section 6.2 establishes that, for an urgent Crown development application, EIA status is the sole statutory source of guaranteed publicity, guaranteed consultation of the wider Schedule 4 statutory consultees, and a guaranteed minimum period before determination. PPC therefore treats the screening decision as the single most consequential procedural decision in this case, and addresses it fully.

16.2 The legal framework

16.2.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571), as amended by SI 2025/412 to accommodate the Crown Development routes, apply to development under the urgent route unless otherwise exempt. Government guidance confirms this expressly (PPG Paragraph 064, Reference ID 44-064-20250512), and confirms that screening and scoping direction requests are to be submitted to the Secretary of State.

16.2.2 "EIA development" is Schedule 1 development, or Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

16.2.3 The proposal is capable of falling within **Schedule 2, paragraph 10(b) - "urban development projects"**, for which the applicable threshold is that the development includes more than 1 hectare of urban development which is not dwellinghouse development, or the area of the development exceeds 0.5 hectare where it includes more than 150 dwellings. The Site substantially exceeds 1 hectare.

16.2.4 Where a Schedule 2 threshold is met, the question is whether the development is **likely to have significant effects on the environment**, applying the selection criteria in Schedule 3: the characteristics of the development (including its size and design, cumulation with other development, use of natural resources, production of waste, pollution and nuisances, and risks to human health); its location (including the environmental sensitivity of geographical areas likely to be affected, having regard to existing and approved land use, the abundance and regenerative capacity of natural resources, and the absorption capacity of the natural environment); and the types and characteristics of the potential impact.

16.2.5 The Court of Appeal and Supreme Court authorities on screening are well settled: the question is one of judgement for the screening authority, but must be exercised on the correct legal basis, with reasons, and in a manner that permits the public to understand the basis for the conclusion. In *R (Champion) v North Norfolk District Council* [2015] UKSC 52, [2015] 1 WLR 3170, Lord Carnwath emphasised the need for a properly informed screening exercise, while confirming that the court will not intervene in matters of evaluative judgement absent error of law. In *Berkeley v Secretary of State for the Environment, Transport and the Regions* [2001] 2 AC 603, the House of Lords held that the requirements of EIA cannot be treated as satisfied by an informal equivalent, and that the public's right to participate in a properly informed decision-making process is a substantive one.

16.3 Why PPC submits this is EIA development

16.3.1 Applying Schedule 3, PPC identifies the following factors, each of which points towards significance and which, cumulatively, PPC submits are compelling.

Characteristics of the development:

- **Size.** The introduction of a resident population in the order of 1,200 to 1,250 at a single point, plus staff and servicing, is a population change of the same order as a substantial housing allocation.
- **Cumulation.** Very substantial committed growth exists in the Bicester area, including the North West Bicester allocation, Graven Hill, South West Bicester and further growth proposed through the emerging Local Plan Review. Cumulative effects on the highway network, on Bicester Sewage Treatment Works and on the Ray catchment require assessment.
- **Use of natural resources.** Potable water demand in an area of serious water stress.
- **Production of waste.** Municipal, food, clinical and foul waste from a facility of this size.
- **Pollution and nuisances.** Foul discharge to a catchment with recognised capacity and infiltration constraints; light pollution in an intrinsically dark landscape; traffic and noise on a rural network.
- **Risk to human health.** Land contamination on a site last assessed for a commercial or industrial end use, now proposed for residential-equivalent occupation by a population that will live and sleep on site.

Location of the development:

- Proximity to the Arncott Bridge Meadows SSSI and the wider Ray, Otmoor and Bernwood designated site network.
- Position within a landscape identified in Cherwell's own Green and Blue Infrastructure Strategy as of high natural capital value with more designated sites than any comparable area in Oxfordshire.
- Position within the River Ray catchment, in an area of recognised groundwater infiltration and seasonal waterlogging.
- Absorption capacity of the receiving environment: on the evidence at Section 9, limited.

16.3.2 PPC submits that a screening opinion concluding that significant environmental effects are unlikely could not, on this material, be reached lawfully without a substantially fuller evidential basis than presently exists.

16.4 Scoping

16.4.1 If, as PPC submits, the proposal is EIA development, PPC requests that a scoping direction be sought and that the Environmental Statement address, as a minimum: air quality; noise and vibration; land quality and contamination; water resources, flood risk and drainage; foul drainage and wastewater treatment capacity, including effects on the receiving water bodies; ecology and biodiversity, including protected species and BNG; landscape and visual effects, including night-time effects; transport and access, including pedestrian and cycle safety; socio-economics and effects on community services and infrastructure; human health; cultural heritage and archaeology; climate change mitigation, adaptation and resilience; major accidents and disasters; waste; and cumulative and in-combination effects.

16.4.2 PPC requests that any screening or scoping direction, and the reasons for it, be published, and that interested parties be given an opportunity to comment before it is finalised.

16.5 A specific request as to scale

16.5.1 PPC's earlier draft speculated about an earlier scheme at a smaller scale. PPC does not repeat that speculation, which it cannot verify. PPC instead makes a straightforward request: that the Applicant state the **maximum bed capacity applied for**, and that any permission granted be limited by condition to that capacity. Without a stated capacity, no environmental assessment can be undertaken, no infrastructure capacity assessment can be undertaken, and no transport assessment can be undertaken. The absence of a stated capacity in the published material is itself a fundamental evidential deficiency.

16.6 The screening direction of 26 August 2026

16.6.1 On 26 August 2026 the Secretary of State issued a screening direction under regulation 5(3) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The direction accepts that the proposal is Schedule 2 development falling within paragraph 10(b), and directs that it is "not likely to have significant effects on the environment" and therefore is "not 'EIA development'". The direction letter carries no reasoning; it refers to "the attached written statement which gives the reasons for direction as required by 5(5)". The decision "was made by officials on behalf of the Secretary of State".

16.6.2 PPC does not in this representation advance a legal challenge to that direction. It makes five factual submissions and invites the Secretary of State to reconsider the direction under regulation 5.

16.6.3 (a) The screening request preceded material parts of the evidence base. The request is dated 3 July 2026. It preceded the submission of the application on 6 July. The Noise and Air Quality Technical Notes were, on the Applicant's own account, still being finalised on 6 July. Natural England's substantive advice on the SSSI hydrological pathway was not given until 23 July, and remains conditional and unresolved.

16.6.4 (b) The screening request describes a foul drainage arrangement which the Applicant's own drainage report had by then superseded. The request states that "Any hydrological impacts would be mitigated through the treatment process and, where required, by agreement with the Environment Agency through the Environmental Permit process" and that "If necessary, tankering of foul effluent will be implemented during the initial phases and for a limited number of SU's". The Drainage Design Statement of June 2026 had by then selected a **new on-site wastewater treatment works discharging to an unidentified watercourse**, with a cesspool and tankering in Phase 1, as the design basis. Whether the screening exercise assessed that scheme, against the Schedule 3 criteria of pollution and nuisances, use of natural resources and the environmental sensitivity of the receiving area, is a matter PPC asks to be confirmed.

16.6.5 (c) Several Schedule 3 criteria could not have been assessed on the information available. Land contamination could not be assessed, because no intrusive investigation exists and the conceptual site model is not legible. Ecological effects could not be assessed, because nine protected species surveys are outstanding and no biodiversity baseline exists. Lighting effects could not be assessed: the screening request itself records that "The current scheme design does not include details of lighting provision... **impacts from operational lighting are unknown**". Decommissioning effects could not be assessed: in every topic section of the request the same sentence appears, that "there is no information currently available on the plan for the Site once the Proposed Development is decommissioned".

16.6.6 (d) The matters PPC identified at 16.3.1 as pointing to significance have, in the main, been confirmed rather than dispelled. The population change is confirmed at 1,256 plus 130 staff. Potable water demand of the order of 194 cubic metres per day arises in an area of serious water stress. Municipal, food and clinical waste arises from a facility providing three meals a day to 1,256 people and operating a medical centre with isolation units, and no waste strategy has been produced. Foul discharge is now proposed to a watercourse in a catchment which the Applicant's own report identifies as within a Nitrate Vulnerable Zone and a Drinking Water Safeguard Zone. Light pollution remains wholly unassessed. Risk to human health arises on a site with confirmed asbestos and a munitions handling history on which no intrusive investigation has been carried out. And two matters PPC could not have anticipated have been added: an on-site sewage treatment works and on-site electricity generation of approximately 2.16 MVA.

16.6.7 (e) The consequences of the direction are procedural as well as environmental, for the reasons at 6.2.9 and 6.6.

16.6.8 PPC accordingly requests that the written statement of reasons be published in full, that interested parties be given an opportunity to comment on it, and that the Secretary of State reconsider the direction in the light of the matters at 16.6.3 to 16.6.6.

16.6.9 The request at 16.5.1 that the Applicant state the maximum bed capacity applied for **has been met**. The capacity is 1,256. PPC withdraws its observation that the absence of a stated capacity is itself a fundamental evidential deficiency, and asks instead that any permission be limited by condition to that figure. PPC notes, however, that the further difficulty identified at 2.3 of the companion analysis remains: the application is described on the application form as a full application, yet paragraph 1.9 of the Planning Proposal Statement states that it "has adopted a 'Rochdale Envelope approach' and assesses maximum parameters", with "Approval of detailed design... envisaged through relevant approvals at the discharge of conditions stage". The Rochdale Envelope is a technique developed for environmental impact assessment, and it is being deployed here without the assessment framework against which the envelope is tested. The only parameter

PPC has been able to identify as stated anywhere is a maximum building height of 6 metres. PPC requests that the Applicant state, in a single schedule, every parameter it invites the Secretary of State to fix.

17. The Public Sector Equality Duty

17.1 The duty

17.1.1 Section 149 of the Equality Act 2010 requires a public authority, in the exercise of its functions, to have due regard to the need to eliminate discrimination, harassment and victimisation; to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not; and to foster good relations between such persons. Having due regard to the need to advance equality of opportunity involves, in particular, having due regard to the need to remove or minimise disadvantages, to take steps to meet different needs, and to encourage participation.

17.1.2 The duty applies to the Secretary of State in determining this application. It is a duty of substance, to be discharged in substance with rigour and an open mind, and it must be discharged **before** and at the time of the decision, not as a rear-guard justification: *R (Bracking) v Secretary of State for Work and Pensions* [2013] EWCA Civ 1345 at [25]–[26], per McCombe LJ.

17.1.3 The relevance of the duty in this precise context is not theoretical. In *TG and others* [2025] EWHC 596 (Admin), the High Court found a breach of section 149 in relation to the very policy that governs allocation of individuals to sites of this kind, describing the failure in the strongest terms.

17.2 Matters an equality assessment must address

17.2.1 PPC submits that an Equality Impact Assessment for Site A must be prepared, published in full, and made capable of scrutiny within any representation period, and must address at minimum:

- **Disability.** The accessibility of the accommodation, of on-site services and of the external environment for people with physical and sensory impairments and for people with mental health conditions; the reasonable adjustments duty, in light of the finding in *TG*; and the accessibility of off-site services given the transport constraints identified at Section 8.
- **The interaction of vulnerability with isolation.** The published independent evidence identifies isolation and lack of meaningful activity as recurrent features of remote large sites. The assessment must address how the specific locational characteristics of Site A - distance from services, absence of public transport, absence of safe pedestrian routes - bear on people with protected characteristics.
- **Religion or belief.** Access to places of worship, dietary provision, and facilities for religious observance on site.
- **Age.** The stated age range of 18 to 65, and the arrangements for age-disputed cases, including the safeguarding consequences if a child is wrongly assessed as an adult and accommodated on the Site.
- **Sex.** The implications of an exclusively male facility for the female staff who would work there, for women in the surrounding community, and for the arrangements for anyone whose sex or gender is subsequently identified differently from the allocation assumption.
- **Race.** Access to interpretation and translation; the published evidence of racially motivated incidents at comparable sites and the measures proposed to prevent them; and the fostering of good relations between the site population and the settled community.

- **Pregnancy and maternity, and gender reassignment**, so far as engaged by allocation policy.
- **Sexual orientation.** A significant proportion of those seeking asylum have fled persecution on grounds of sexual orientation. Within a large, congregate, single-sex population, some of the same hostility may be present, and the fear of it may deter individuals from disclosing their orientation or seeking protection. The assessment must address how such individuals would be identified, safeguarded and, where necessary, transferred, and must not assume that placement on this Site is safe for them.
- **The allocation policy itself.** How the published Allocation of Asylum Accommodation Policy would be applied to this Site; the criteria for assessing unsuitability; the mechanism and timescale for transfer where needs cannot be met; and how the systemic failure identified in *TG* has been remedied.
- **The existing community.** The duty to foster good relations runs in both directions. The assessment must address the arrangements for community engagement, for information provision and for addressing concerns.

17.2.2 PPC requests that the assessment identify what mitigation is proposed, how it is to be secured (by condition, by obligation or by contract), and how compliance would be monitored over the intended operational life.

17.3 The Equality Impact Assessment as submitted

17.3.1 An Equality Impact Assessment has been submitted. It is signed off on 28 May 2026, is stated to be subject to review "six months from date given below or earlier where necessary", and records its publication status on gov.uk as "Not decided yet".

17.3.2 PPC records what the assessment does. It addresses all nine protected characteristics. It identifies direct discrimination on grounds of age and sex, arising from the restriction of the Site to adult males aged 18 to 65, and justifies it under section 13(2) of the Equality Act 2010 and under the communal accommodation and single-sex service provision exceptions in Schedules 23 and 3. It relies on the Schedule 18 disapplication of the section 149(1)(b) duty in respect of age and race in immigration functions. It concludes that the proposals are not directly or indirectly discriminatory in respect of the remaining characteristics, subject to mitigation.

17.3.3 PPC makes four submissions against the ten matters it identified at 17.2.1.

17.3.4 (a) The assessment engages with no case law. PPC has identified no citation of any authority anywhere in it, and in particular no citation of *TG and others v Secretary of State for the Home Department* [2025] EWHC 596 (Admin). That is the decision in which the High Court found a systemic breach of section 149 in relation to the very allocation policy which would govern placements at this Site, in the strongest terms, and it is the authority on which PPC relies at 14.2.2 and 17.1.3. It is not addressed.

17.3.5 (b) The receiving community is not assessed by protected characteristic. The evidence base is Home Office asylum statistics and internal policy documents. PPC has identified no demographic or equality evidence about Piddington or the surrounding parishes: no local data on age structure, disability prevalence, sex ratio, ethnicity or religion. Community impact is addressed under "Fostering good relations" in general terms of anxiety, cohesion, protest and policing, and not through the section 149 framework. The duty runs in both directions, as PPC states at 17.2.1.

17.3.6 (c) Disability is addressed by exclusion rather than by design. The assessment records that the Site and rooms are not adapted for those with particular accessibility needs and that this "could prevent service users making full use of the Site's amenities and facilities", and relies on individual suitability assessment and relocation. Paragraph 3.15 of the Planning Proposal Statement records that inclusive design "is ongoing and is to be finalised at the detailed design stage". PPC records that the Travel Plan states at its paragraph 4.6.1 that "The detailed design of the development and its internal transport infrastructure **has been** undertaken in accordance with the requirements of the 2010 Equality Act", which is difficult to reconcile with the other two statements, and asks that the position be clarified.

17.3.7 (d) Several of the matters at 17.2.1 are addressed only by deferral. The assessment records that a maximum length of stay "may be imposed... however, this will be subject to confirmation through Business Design and operational planning"; that the nature and scope of health provision "will be determined as part of operational mobilisation and kept under review"; that "The exact provision for this Site is subject to discussion with the local health authorities"; that shuttle buses "may be considered"; and that additional police demand "may justify additional funding". Across most characteristics the same formula recurs: "the operation of the Site will be kept under review and this assessment updated as necessary".

17.3.8 The duty in section 149 must be discharged in substance, with rigour and an open mind, before and at the time of the decision: *R (Bracking) v Secretary of State for Work and Pensions* [2013] EWCA Civ 1345 at [25]-[26]. An assessment which does not consider the receiving community by protected characteristic, does not engage with the leading authority on the same allocation policy at a comparable site, and is expressly provisional and unpublished, is not in PPC's submission a sufficient basis on which the Secretary of State can discharge that duty in respect of this decision.

17.3.9 PPC requests that a revised Equality Impact Assessment be produced and published in full, addressing each of the ten matters at 17.2.1, before determination.

18. Cumulative Impact and the Overall Planning Balance

18.1 The impacts must be considered cumulatively

18.1.1 Each of the grounds developed above could, taken alone, be presented as a discrete technical matter capable in principle of resolution by further survey work, mitigation or condition. PPC's central submission is that they must be considered together.

18.1.2 When they are, the picture that emerges is not one of a fundamentally sound proposal with outstanding details to be resolved. It is of a proposal that is, in multiple independent respects, poorly matched to its location:

- a site outside the settlement hierarchy, without public transport, and dependent for its viability on being engineered to be self-sufficient;
- served by an unlit, footway-less rural corridor on which an independent Inspector has already found pedestrian safety risk to have been given insufficient attention, now proposed to serve a scheme substantially larger than the one he considered;
- draining to a catchment with known infiltration problems and a treatment works whose growth upgrade was designed to a horizon reached in the present year, where the deliverability of further investment is subject to an unresolved regulatory and financial process in which the responsible Secretary of State has warned Parliament of potential decade-long deferral of wastewater schemes;
- with an ecological baseline approaching two decades old, in a landscape identified by the local planning authority's own evidence base as containing more designated sites than any comparable area in the county;
- with a land quality assessment prepared for a commercial end use, now proposed for residential-equivalent occupation;
- with no published flood risk assessment for a site exceeding one hectare in a river catchment with recognised groundwater issues;
- in a location where a materially similar proposal was recommended for refusal by an independent Inspector, approved on the basis of asserted urgent national need, and then abandoned as uneconomic within two years.

18.1.3 A site is not rendered acceptable by resolving any one of those matters individually. Its unsuitability is confirmed by the accumulation of them.

18.2 The benefit side of the balance

18.2.1 PPC does not dispute that the provision of asylum accommodation serves a public interest, nor that relief of pressure on the accommodation estate is a benefit capable of weighing in favour of the proposal. PPC makes four submissions about the **weight** properly attaching to that benefit.

(a) The benefit is national and generalised; the harms are specific and local. That does not disqualify the benefit, but the decision-maker should be alert to the asymmetry. The community that would bear the entirety of the identified harms would receive none of the identified benefit.

(b) The benefit is not site-specific. The accommodation places are fungible. The weight attaching to their delivery *here* is affected by the availability of other means of delivering them (Section 15.1.4(c)).

(c) The benefit is contingent on deliverability, which is not established. On the Applicant's own account the Site remains subject to feasibility assessments that may take several months and do not predetermine its use. The published record of large-site delivery, including at this very location, is one of substantial abandonment. A benefit that may not materialise attracts reduced weight.

(d) There is no countervailing local benefit. The proposed occupants would not meet local housing need. The facility is intended to be substantially self-sufficient and is therefore not expected to generate significant local employment or expenditure benefit to village economies. No infrastructure funding commitment tied to Site A has been published.

18.3 The balance

18.3.1 Weighing the generalised, contingent and non-site-specific national benefit against the specific, evidenced and in several respects statutory harms identified in this representation.

PPC's submission is that the balance falls decisively against the grant of permission.

18.3.2 That conclusion holds on the ordinary section 38(6) analysis, before the urgency and procedural objections in Part B are taken into account. Taking those objections into account as well,

PPC submits that the case for refusal, or, at minimum, for redirection to the standard Crown Development route for fuller and independent scrutiny, is compelling.

18.4 The cumulative picture as it now stands

18.4.1 Paragraph 18.1.2 listed seven respects in which the proposal is poorly matched to its location. Each was framed, of necessity, on the material then available. PPC restates the list against the Applicant's own submitted evidence.

Proposition at 18.1.2	Position on the Applicant's own material
A site outside the settlement hierarchy, without public transport, dependent for its viability on being engineered to be self-sufficient	**Confirmed.** "There is currently no pedestrian infrastructure provided along this section of the B4011, making both accesses inaccessible by foot"; the nearest bus stops cannot be reached on foot; "There are very limited facilities in the immediate vicinity of the Site... However, this is not considered to be a material constraint because the proposed development is intended to operate as a self-contained site"
Served by an unlit, footway-less rural corridor on which an Inspector has already found pedestrian safety risk to have been given insufficient attention, now proposed to serve a substantially larger scheme	**Confirmed and worsened.** No footway, lighting or crossing is proposed; no off-site mitigation of any kind; residents "free to come and go" are addressed by a recommendation that they use minibuses; the 2003 finding is not engaged with anywhere. The scheme is 67 per cent larger than the one the Inspector considered
Draining to a catchment with known constraints and a treatment works whose growth upgrade was designed to a horizon reached this year	**Confirmed and worsened.** The Applicant's own consultant records that "It is not clear whether the design population for 2026 has materialised and therefore whether any headroom is likely to be available". Thames Water has never been asked. A new on-site treatment works discharging to an unidentified watercourse is now proposed instead
An ecological baseline approaching two decades old, in a landscape containing more designated sites than any comparable area in the county	**Corrected and worsened.** There was no site-specific baseline at all before March 2026. What exists is a single-visit walkover, partly outside season, with nine surveys outstanding and no biodiversity net gain information of any kind
A land quality assessment prepared for a commercial end use, now proposed for residential-equivalent occupation	**Superseded and worsened.** The superseding assessment is a desk study containing no intrusive data at all, on a site with confirmed asbestos and a munitions handling history
No published flood risk assessment for a site exceeding one hectare in a catchment with recognised groundwater issues	**Narrowed and worsened.** A Flood Risk Assessment exists but is written for a 50.1 hectare area and for "any future development", states no climate change allowance, does not classify the vulnerability of the use proposed, and is accompanied by a drainage strategy which places Phase 1 on the lowest part of the Site with no attenuation
A location where a materially similar proposal was recommended for refusal, approved on asserted urgent national need, and abandoned as uneconomic within two years	**Unchanged, and now relied upon by the Applicant** as establishing the principle of development (7.8.7-7.8.8)

18.4.2 To that list PPC now adds four matters which the application has itself introduced: a sewage treatment works proposed 45 metres from sleeping accommodation with no odour assessment; on-site electricity generation of approximately 2.16 MVA with no air quality or noise assessment; a use described as temporary in the application and as long-term, permanent and expanding in the documents supporting it; and a scheme in which sixteen substantive matters are deferred to condition, to detailed design or to a later design stage, on a route where no independent decision-maker will ever examine them.

18.4.3 PPC's submission at 18.1.3 is unchanged and is, if anything, made good by the application: a site is not rendered acceptable by resolving any one of these matters individually. Its unsuitability is confirmed by the accumulation of them.

18.4.4 As to the benefit side of the balance at 18.2.1, PPC records that limb (c) is now supported by the Applicant's own evidence. The benefit is contingent on deliverability, and deliverability is not established where the drainage viability "has not been determined", the electrical network "cannot be relied upon", the ground conditions "remain unverified" and the utilities proposals "remain illustrative".

19. Without Prejudice: Conditions and Obligations If the Secretary of State Is Minded to Grant

19.1 The basis of this section

19.1.1 PPC's primary case is that permission should be refused. This section is advanced strictly without prejudice to that case, and its inclusion should not be taken as any concession that the harms identified are capable of being made acceptable.

19.1.2 PPC includes it for two reasons. First, professional practice requires an objector who identifies harm to assist the decision-maker as to how harm would be addressed if the primary case is not accepted. Second, and importantly, the 2003 Inspector considered that a financial contribution towards affected local services should have been secured through the section 299A agreement, and the First Secretary of State did not follow that recommendation. PPC does not wish to see that outcome repeated by default.

19.2 The mechanism

19.2.1 Section 299A of the 1990 Act enables the appropriate authority to enter into planning obligations in respect of Crown land, in terms corresponding to section 106(1)(a) to (d). Obligations so entered into are enforceable by injunction, but the appropriate authority's consent is required to any such action (section 299A(5)). PPC requests that, if permission is granted, a section 299A agreement be concluded before the grant, and that it include an unqualified advance consent to enforcement proceedings.

19.2.2 PPC further requests confirmation of the CIL position and, if CIL is payable, that it be paid before commencement.

19.3 Conditions sought

19.3.1 If minded to grant, PPC requests that permission be subject to conditions including:

- **A cap on maximum occupancy**, expressed as a maximum number of persons accommodated on the Site at any time, with a requirement for monthly reporting to the local planning authority.
- **A time limit.** PPC submits that any permission should be time-limited rather than permanent, with a requirement to cease the use and restore the Site at the end of the period. The Applicant's own stated position is a minimum of ten years; a permission of defined duration would permit the position to be reviewed against the demand position at that time, and would respond directly to the volatility demonstrated by the 2001–2005 programme.
- **Phasing tied to infrastructure delivery**, so that occupancy above defined thresholds is not permitted until identified wastewater, water, highway, active travel and healthcare provision is in place and operational.
- **No occupation until foul drainage capacity is confirmed** in writing by the sewerage undertaker, with any required network reinforcement completed.
- **No occupation until approval of a surface water drainage strategy** and of its long-term maintenance arrangements, agreed with the lead local flood authority.

- **Approval of a remediation strategy and verification report** calibrated to residential-equivalent occupation, with a watching brief for unexpected contamination.
- **Approval of a Construction Environmental Management Plan** and an operational Environmental Management Plan.
- **Prior to commencement approval of an external lighting scheme** designed to the relevant environmental zone standard, with a lux contour plan, a bat-sensitive lighting design and a curfew regime.
- **Prior to commencement approval of a Landscape and Ecological Management Plan** for a minimum thirty-year period, with monitoring and remedial provisions.
- **Delivery of the Biodiversity Gain Plan**, with identification of the responsible planning authority.
- **Prior to occupation approval and implementation of a Travel Plan**, with a named coordinator, binding modal share targets, monitoring, and remedial contributions on failure.
- **Prior to occupation delivery of pedestrian and cycle infrastructure**, including continuous lit footway provision along the identified lengths of the B4011 and Widnell Lane and safe crossing points, in advance of first occupation.
- **Prior to commencement approval of a Site Management Plan**, covering security, incident reporting, complaints handling, community liaison and the multi-agency forum, reviewed annually.
- **Approval of a servicing and delivery management plan**, restricting HGV movements by time and routeing.
- **Restoration.** A scheme for cessation of use and restoration of the Site, secured by obligation, with a financial bond or equivalent security.

19.3.2 PPC records that conditions requiring approval of details are of limited value unless the approving authority is identified, resourced and able to enforce. PPC requests that the decision notice identify the local planning authority as the discharging authority for all conditions, and that the section 299A agreement provide for the Applicant to meet the authority's reasonable monitoring costs.

19.3.3 Following publication of the application documents, PPC adds the following to the conditions sought at 19.3.1:

- **A cap of 1,256 bedspaces**, that being the capacity now applied for, with no increase permitted otherwise than by a further application.
- **Removal of permitted development rights** under Part 19 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 in respect of the application site, and refusal of the request at paragraphs 5.84 to 5.88 of the Planning Proposal Statement.
- **No commencement until a Phase 2 intrusive ground investigation**, calibrated to residential-equivalent occupation and including ground gas and controlled waters assessment, has been carried out, reported and approved.
- **No commencement until the outstanding protected species surveys have been completed** in appropriate seasons and any necessary licences obtained or confirmed to be obtainable.
- **No commencement until the pre-development biodiversity value has been established** by survey to the current statutory metric and a Biodiversity Gain Plan approved.
- **No commencement of the wastewater treatment works until its outfall has been identified, an environmental permit obtained, and odour and noise impact assessments carried out and mitigation approved**, with a minimum separation distance between the works and any sleeping accommodation secured on the approved plans.
- **No occupation of Phase 1 until a surface water attenuation solution for Phase 1 has been approved** by the lead local flood authority, or that authority has confirmed in writing that none is required.
- **Approval of a flood evacuation and emergency response plan** before first occupation, agreed with the Environment Agency and the emergency services.
- **Limitation on on-site electricity generation**, with approval of generating plant, fuel storage, bunding, running hours and emissions and noise mitigation before installation.
- **A single approved description of development and an approved parameters schedule**, with no departure otherwise than by a further application.

19.4 Obligations sought

19.4.1 PPC requests that any section 299A agreement secure:

- financial contributions towards the identified capacity impacts on primary care, mental health services, ambulance services and policing, calculated on evidence;
- contributions towards highway and active travel infrastructure identified in the Transport Assessment;
- a community fund, administered locally by Parish Councils, proportionate to the assessed local impact;
- funding for the local planning authority's monitoring and enforcement costs;
- the restoration bond referred to above; and
- binding provision for the multi-agency forum, including parish council representation.

20. Conclusion and Relief Sought

20.1 Summary

20.1.1 For the reasons set out in this representation, **Piddington Parish Council objects** to the proposed Crown Development at Site A, MOD Bicester, both in principle and in detail.

20.1.2 PPC's objection is grounded in the applicable statutory and policy framework, in the Applicant's own published material, in independent scrutiny by the National Audit Office, parliamentary committees and the Independent Chief Inspector of Borders and Immigration, in reported decisions of the High Court, and in the Home Office's own directly relevant prior experience of a materially similar proposal at this same location. That earlier proposal was recommended for refusal by an independent Inspector, and the Home Office itself subsequently abandoned it.

20.2 Relief sought

20.2.1 PPC respectfully requests that the Secretary of State:

- **Require the Applicant to publish, in full**, its statement of national importance and urgency under article 6(1)(c)(iv), its statement of planning acceptability under article 6(1)(c)(v), and all technical assessments, before any representation period begins.
- **Scrutinise rigorously** the assertion that the statutory tests in sections 293B and 293C are satisfied, and decline to accept the urgency certification in light of the Applicant's own published position the Site remains subject to feasibility assessments and which do not predetermine use.
- **Redirect the application to the standard Crown Development route** under sections 293D to 293J and SI 2025/409, to be determined in the first instance by an independent Planning Inspector following an inquiry or hearing.
- **Screen the proposal as EIA development**, thereby engaging the mandatory publicity, consultation and determination periods in articles 11, 14 and 17 of SI 2025/411.
- **Publish a representation period of not less than 30 days** under article 10, and undertake not to exercise the powers in articles 13(3) and 15(3).
- **Appoint an independent technical advisor** under PPG Paragraph 062.
- **Require the further information** identified in this representation and at Appendix F, exercising the power recognised at PPG Paragraph 057.
- **Require site-specific capacity assessments**, agreed with all relevant statutory bodies.
- **Require a current, appropriately licensed, multi-season ecological survey**, a use-specific land contamination assessment, a site-specific Flood Risk Assessment and drainage strategy, a Transport Assessment agreed with the highway authority, a Landscape and Visual Impact Assessment and a published Equality Impact Assessment, in each case before any decision.
- **Undertake to afford interested parties a further opportunity to make representations** if the revised National Planning Policy Framework is published before determination.
- **Ultimately, refuse the application**, on the basis that it conflicts with the development plan and with national planning policy, and that the identified harms are not outweighed by the generalised national benefit relied upon.

20.2.2 Following publication of the application documents, PPC additionally requests that the Secretary of State:

- **Exercise the power recognised at Planning Practice Guidance Paragraph 057** (Reference ID 44-057-20250512) to require from the Applicant the further information scheduled at **Appendix F**, and defer determination until it has been supplied and published.
- **Reconsider the screening direction of 26 August 2026** under regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, for the reasons at Section 16.6, and publish the written statement of reasons accompanying it.
- **Require the Applicant to publish, in a legible and text-searchable form**, the whole of the Preliminary Geo-environmental and Geotechnical Assessment including its Appendix E; sections 4.1 to 4.3 and Table 3-1 of the Flood Risk Assessment; sections 3 and 4 and Appendix B of the Preliminary Ecological Appraisal; the risk matrix in the Preliminary UXO Risk Assessment; and legible versions of the four application drawings.
- **Require the Applicant to publish a complete Planning Proposal Statement**, or to identify each omission as a redaction and state its statutory basis.
- **Require the production of the documents relied upon but not submitted**, namely the tree survey, the Security Management Plan, the Asbestos Demolition Survey of April 2026, the Site Feasibility Study (2025) and the Home Office Scoping Report (2026).
- **Require Natural England to be formally re-consulted**, as its letters of 4 June and 23 July 2026 both require, on the actual drainage strategy including the proposed on-site wastewater treatment works and the unattenuated Phase 1 surface water discharge, and publish its statutory consultation response.
- **Appoint an independent technical advisor** under Planning Practice Guidance Paragraph 062 in respect of foul drainage and wastewater treatment capacity, surface water and flood risk, land contamination and ground conditions, and highway safety.
- **Require the Applicant to state**, in a single schedule, every parameter it invites the Secretary of State to fix; to adopt a single description of development; and to confirm whether the use applied for is temporary or long-term.
- **Record in the decision**, as part of the reasons required by article 18(2), the sequence in which the technical assessments were produced and the extent to which each informed rather than followed the proposal (Section 5A.8).
- **Correct expressly** the statement at paragraph 5.1 of the Planning Proposal Statement that there is no statutory requirement for the decision maker to consider compliance with the development plan, and record that the application has been determined in accordance with the development plan unless material considerations indicated otherwise.

20.3 Reservation of position

20.3.1 This representation is submitted on the information available to PPC as at 30 July 2026. PPC expressly reserves the right to supplement, expand or refine it as application documents, technical evidence and the outcome of information requests become available, and to make further representations on any new material consideration arising before determination.

20.3.2 PPC will maintain a running log of every statutory step taken or not taken in this application, cross-checked against the published register, so that it is in a position to demonstrate precisely what was and was not consulted upon.

20.4 Declaration

20.4.1 This representation has been prepared on behalf of Piddington Parish Council, drawing on the sources identified at Appendix C, and reflects PPC's considered and formally resolved position as at the date of this document. It is submitted in good faith and in the public interest of the communities PPC represents, in the hope that it will assist the Secretary of State, Cherwell District Council and the Planning Inspectorate in reaching a properly informed, lawful and sustainable decision.

Cllr Mr Tim McNally (Chair)

Piddington Parish Council

16th September 2026

Appendix A: Summary of Grounds of Objection

Ground	Short title	Core proposition	Principal supporting material
1	National importance	The national importance test is not established at the level of this individual site. A generalised, system-level public interest cannot be transposed onto a single-site planning decision so as to displace site-specific planning judgement.	s.293B TCPA 1990; art. 6(1)(c)(iv) SI 2025/411; WMS 13.02.2025 (HCWS454); PPG Para 043 (44-043-20250512)
2	Urgency	The urgency test is not satisfied. It is contradicted by the Applicant's own factsheet (feasibility assessments of several months; no final decision taken), by the stated minimum ten-year operational life, and by the Government's own reported halving of hotel use.	s.293B TCPA 1990; PPG Para 027 (44-027-20250512); Home Office factsheet 30.06.2026; ministerial statement 25.06.2026
3	Procedural fairness, publicity and the EIA gateway	SI 2025/411 provides **no** guaranteed representation period, site notice, newspaper publicity or neighbour notification for non-EIA urgent applications; those protections arise only if the application is an EIA application. Fairness requires that the omissions be made good.	arts. 9, 10, 11, 13, 14, 15, 16, 17 SI 2025/411; *R (Moseley) v Haringey LBC* [2014] UKSC 56; PPG Paras 044, 049, 057, 062
4	Development plan conflict and locational unsustainability	Conflict with Policies PSD1, Villages 1, BSC 2, BSC 10–12, SLE 4, ESD 1, ESD 6, ESD 7, ESD 8, ESD 10, ESD 13, ESD 15, ESD 17 and INF 1 of the adopted Local Plan and saved Policy C15 (CLP 1996); site outside the settlement hierarchy; NPPF Chapters 8, 9, 12, 14, 15.	s.38(6) PCPA 2004; *Tesco v Dundee* [2012] UKSC 13; *Hopkins Homes* [2017] UKSC 37
5	Highway safety and access	Unlit, footway-less rural corridor; an independent Inspector has already found pedestrian road safety risk at this location to have been given insufficient attention, in relation to a scheme 40 per cent smaller.	Inspector's report 18.04.2003, para 14.75, as recorded in *R (Cherwell DC) v FSS* [2004] EWHC 724 (Admin); NPPF paras 115–116; Policy SLE 4
6	Infrastructure capacity	Bicester STW growth upgrade designed to a 2026 horizon; catchment with recognised groundwater infiltration; deliverability of further AMP8 investment uncertain following the Environment Secretary's June 2026 warning of possible decade-long deferral of wastewater schemes; no published capacity assessment for any utility or service.	Policy INF 1; NPPF Ch. 8; Hansard, 16.06.2026; Bicester STW growth scheme design data
7	Ecology, protected species and BNG	Baseline approaching two decades old; site within a designated-site-rich landscape; ten-year duration places the scheme outside the new five-year temporary BNG exemption, so the full 10 per cent obligation applies.	Conservation of Habitats and Species Regulations 2017 regs 9(3), 43, 55; WCA 1981 s.28G; Sch. 7A TCPA 1990; PPG Para 053
8	Land quality and contamination	Most recent assessment prepared for a commercial/industrial end use; residential-equivalent occupation engages materially	NPPF paras 189–191; Part 2A EPA 1990; 2010 Land Quality Assessment (Entec)

Ground	Short title	Core proposition	Principal supporting material
		different exposure assumptions; no updated assessment in sixteen years.	
9	Landscape, character, heritage and dark skies	Fundamental change from a low-activity screened compound to a 24-hour illuminated facility in an intrinsically dark landscape; no published LVIA.	NPPF paras 136, 198, Ch. 16; Policies ESD 13, ESD 15, ESD 17; saved Policy C15
10	Flood risk, drainage and climate resilience	Site exceeds 1 hectare, so a site-specific FRA is required irrespective of flood zone; River Ray catchment; recognised groundwater infiltration; artesian conditions; LLFA not a prescribed consultee.	NPPF Ch. 14, para 173; Policies ESD 1, ESD 6, ESD 7
11	Public health, safeguarding and social impact	Documented, foreseeable welfare risk at remote large sites, established judicially and by independent inspection; interface with local services greater than the self-sufficiency model predicts; oversight and enforceability weak.	*TG and others v SSHD* [2025] EWHC 596 (Admin); ICIBI inspection 2023–24; HC 580 (2025); NAO HC 874 (2025)
12	Need, alternatives, deliverability and value for money	Alternatives are engaged as a component of the urgency test and of EIA, not as a freestanding *Jones* objection; published record of large-site abandonment, including at this location; NAO records a move away from sites above 1,000 places.	PPG Para 027; reg. 18(3)(d) EIA Regs 2017; *R (Jones) v North Warwickshire BC* [2001] EWCA Civ 315 (addressed); NAO 2024, 2025; NAO Bicester cancellation report

A.2 Status of each ground following publication of the application (Version 4.0)

Ground	Status	Principal reason	Assessed at
1	Stands	The Statement quantifies a national requirement but not this Site's contribution to it; none of the four questions at 4.3.3 is answered	4.4
2	Stands and is strengthened	The deadline asserted is a Home Office programme assumption; the consequence is not quantified; the self-set approval date passed without a decision; and the scheme cannot presently be designed	5.8, 5A
3	Stands - now the pivotal ground	The screening direction of 26 August 2026 closes the only statutory route to guaranteed publicity, consultation of the wider statutory consultees and a minimum determination period	6.6, 16.6
4	Stands and is materially strengthened	The Planning Proposal Statement asserts that development plan compliance need not be considered, contrary to PPG Paragraph 051, and then recites eleven engaged policies without applying them	7.8
5	Stands; narrowed in one particular	Six of the eight tests at 8.3.3 are not met; no scoping with the highway authority; residents' pedestrian movements addressed by a recommendation, not an assessment. The trip-rate criticism is withdrawn	8.6
6	Stands and is very substantially strengthened	No capacity confirmation from any statutory undertaker; the foul solution is a new on-site works because capacity to treat cannot be established	9.8
7	Stands and is materially strengthened; narrowed in two particulars	No biodiversity net gain information at all; nine protected species surveys outstanding; Natural England's advice rests on abandoned premises. The regulation 63 reservation is withdrawn and the account of the historic baseline is corrected	10.6
8	Stands and is materially strengthened	No intrusive investigation of any kind on a former ordnance depot with confirmed asbestos; the conceptual site model is not legible	11.4
9	Stands and is strengthened; narrowed in one particular	A Statement rather than an assessment to GLVIA3; no lighting assessment at all, on a site where the local planning authority previously objected on lighting grounds	12.5
10	Stands and is very substantially strengthened	No sequential test; no vulnerability classification of the use proposed; no stated climate change allowance; Phase 1 unattenuated on the lowest part of the Site	13.4
11	Stands and is strengthened	The Operational Management Plan does not exist; key sections of the outline plan are blank; the Equality Impact Assessment does not engage with *TG and others*	14.6, 17.3
12	Stands	Alternative procedural routes are considered; alternative sites are not. No value for money analysis and no decommissioning plan	15.5

Ground	Status	Principal reason	Assessed at
13	New	The proposed on-site wastewater treatment works: no outfall, no permit, no odour or noise assessment, process undefined, 45 metres from accommodation	15A.1
14	New	On-site electricity generation of approximately 2.16 MVA, unassessed for emissions, noise, fuel storage and carbon	15A.2
15	New	The temporary ten-year application is contradicted by the long-term, permanent and expanding use described elsewhere, and by the permitted development rights requested	15A.3
16	New	Sixteen substantive matters deferred to condition, detailed design or a later design stage, several going to principle rather than detail	15A.4

Appendix B: Policy and Legal Compliance Matrix (Framework)

B.1 PPC has developed, and will maintain as a living document, a Policy and Legal Compliance Matrix tracking every development plan policy, Framework paragraph, statutory duty and item of guidance relied upon in this representation. It will be supplied in full as a supplementary technical annex once the Applicant's documents are published.

B.2 The matrix is structured under the following headings:

Column	Content
Reference	Policy, paragraph, provision or guidance reference and short title
Requirement	Full text or reasoned summary of the requirement
Applicant's position	The Applicant's stated position, once published, with document and paragraph reference
PPC's assessment	Compliance, conflict or "cannot be assessed on current information", with reasons
Supporting evidence	Reference to the evidence relied upon by PPC
Evidential status	Secured / outstanding / requested (cross-referenced to Appendix F)
Workstream	Responsible PPC workstream

B.3 The matrix will cover, at minimum: the adopted Cherwell Local Plan 2011–2031 (Part 1) policies listed at Section 7.4.1; saved policies of the Cherwell Local Plan 1996; the National Planning Policy Framework (December 2024) Chapters 2, 4, 8, 9, 11, 12, 14, 15 and 16; sections 293B and 293C of and Schedule 7A to the Town and Country Planning Act 1990; section 38(6) of the Planning and Compulsory Purchase Act 2004; SI 2025/411 articles 4 to 20; the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; the Conservation of Habitats and Species Regulations 2017; section 28G of the Wildlife and Countryside Act 1981; section 40 of the Natural Environment and Rural Communities Act 2006; section 149 of the Equality Act 2010; and the Planning Practice Guidance paragraphs cited in this representation.

B.4 *Version 4.0 note.* The Applicant's documents have now been published, and the "Applicant's position" column of the matrix can accordingly be populated. PPC has begun that exercise and its results in respect of the adopted development plan are set out in tabular form at **7.8.4**, which should be treated as the first instalment of the matrix. The full matrix will follow as a supplementary technical annex. PPC records that in respect of eleven adopted policies the Applicant's position column can only be completed with the entry "recited but not applied", for the reasons at 7.8.1 to 7.8.4.

Appendix C: Sources and Authorities Relied Upon

C.1 Primary legislation

- Town and Country Planning Act 1990, in particular sections 38, 70, 77, 293, 293A–293J, 294, 296A, 299, 299A, 321, 327ZA and 333, and Schedule 7A
- Planning and Compulsory Purchase Act 2004, in particular section 38(6) and Part 7
- Levelling-up and Regeneration Act 2023, section 109 and Schedule 10
- Planning and Infrastructure Act 2025 (c. 34), in particular Part 3
- Environment Act 2021, in particular sections 98, 102 and 104 and Schedule 14
- Environmental Protection Act 1990, Part 2A
- Wildlife and Countryside Act 1981, in particular section 28G
- Natural Environment and Rural Communities Act 2006, section 40
- Equality Act 2010, section 149
- Immigration and Asylum Act 1999, sections 95 and 96
- Water Industry Act 1991, in particular sections 2, 94 and 106
- Planning (Listed Buildings and Conservation Areas) Act 1990, sections 16, 66 and 72
- Freedom of Information Act 2000

C.2 Secondary legislation

- Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025, SI 2025/409
- Town and Country Planning (Crown Development Applications) (Hearings and Inquiries) Rules 2025, SI 2025/410
- Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025, SI 2025/411 (with correction slip of 21 May 2025)
- Town and Country Planning (Consequential and Miscellaneous Amendments) Regulations 2025, SI 2025/412
- Town and Country Planning (Fees and Consequential Amendments) Regulations 2025, SI 2025/418
- Levelling-up and Regeneration Act 2023 (Commencement No. 7) Regulations 2025, SI 2025/430
- Community Infrastructure Levy (Amendment etc.) (England) Regulations 2025, SI 2025/433
- Town and Country Planning (Environmental Impact Assessment) Regulations 2017, SI 2017/571
- Conservation of Habitats and Species Regulations 2017, SI 2017/1012
- Town and Country Planning (Development Management Procedure) (England) Order 2015, SI 2015/595, in particular Schedule 4
- Town and Country Planning (General Permitted Development) (England) Order 2015, SI 2015/596, Schedule 2 Part 19

- Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, SI 2017/407
- Biodiversity net gain amendment regulations taking effect on 6 August 2026 (as published July 2026)

C.3 Case law

- *R (Cherwell District Council) v First Secretary of State* [2004] EWHC 724 (Admin)
- *Braintree District Council v Secretary of State for the Home Department* [2023] EWHC 1076 (KB)
- *Braintree District Council v Secretary of State for the Home Department & Anor* [2023] EWCA Civ 727, [2023] 1 WLR 3087
- *R (Clarke-Holland, West Lindsey DC and Braintree DC) v Secretary of State for the Home Department & Anor* [2023] EWHC 3140 (Admin)
- *TG and others v Secretary of State for the Home Department* [2025] EWHC 596 (Admin)
- *NB and others v Secretary of State for the Home Department* [2021] EWHC 1489 (Admin)
- *Epping Forest District Council v Somani Hotels Ltd* (High Court and Court of Appeal, 2025)
- *Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13, [2012] PTSR 983
- *Suffolk Coastal District Council v Hopkins Homes Ltd* [2017] UKSC 37, [2017] 1 WLR 1865
- *South Bucks District Council v Porter (No 2)* [2004] UKHL 33, [2004] 1 WLR 1953
- *R (Champion) v North Norfolk District Council* [2015] UKSC 52, [2015] 1 WLR 3170
- *Berkeley v Secretary of State for the Environment, Transport and the Regions* [2001] 2 AC 603
- *R (Moseley) v Haringey London Borough Council* [2014] UKSC 56, [2014] 1 WLR 3947
- *R v Brent London Borough Council, ex parte Gunning* (1985) 84 LGR 168
- *R (Bracking) v Secretary of State for Work and Pensions* [2013] EWCA Civ 1345
- *R (Jones) v North Warwickshire Borough Council* [2001] EWCA Civ 315
- *Trusthouse Forte Hotels Ltd v Secretary of State for the Environment* (1986) 53 P&CR 293
- *Lord Advocate v Dumbarton District Council* [1990] 2 AC 580

C.4 National policy and guidance

- National Planning Policy Framework, December 2024
- Draft revised National Planning Policy Framework, consultation version, 16 December 2025 (consultation closed 10 March 2026)
- Planning Practice Guidance, “Crown Development and Urgent Crown Development”, updated 12 May 2025, in particular Paragraphs 027, 031, 043, 044, 045, 049, 050, 053, 054, 055, 057, 060, 061, 062, 063, 064 and 065
- Written Ministerial Statement, “Crown Land: Planning Permission for Development”, 13 February 2025 (HCWS454)
- *Guidance on planning propriety: planning casework decisions*, Annex B

- Planning Practice Guidance on environmental impact assessment, biodiversity net gain, flood risk and coastal change, land affected by contamination, and light pollution
- *Manual for Streets*; *Inclusive Mobility*; DfT Local Transport Note 1/20
- *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition
- Institution of Lighting Professionals, *Guidance Note 1 for the Reduction of Obtrusive Light*
- Bat Conservation Trust / Institution of Lighting Professionals guidance on bats and artificial lighting
- CIEEM *Guidelines for Ecological Impact Assessment in the UK and Ireland*
- Land Contamination Risk Management (LCRM) guidance

C.5 Development plan and local evidence base

- Cherwell Local Plan 2011–2031 (Part 1), adopted 20 July 2015, incorporating Policy Bicester 13 re-adopted 19 December 2016
- Cherwell Local Plan 2011–2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, adopted September 2020
- Cherwell Local Plan 1996, saved policies
- Cherwell Local Plan Review 2042, submitted 31 July 2025; examination documents including the Inspectors' initial letter of 10 October 2025 and the Matters, Issues and Questions
- Cherwell Infrastructure Delivery Plan
- Cherwell Green and Blue Infrastructure Strategy
- Oxfordshire Local Nature Recovery Strategy
- Oxfordshire Infrastructure Strategy

C.6 Parliamentary, audit and inspection material

- National Audit Office, *Investigation into asylum accommodation*, 20 March 2024
- National Audit Office, *The Home Office's asylum accommodation contracts*, HC 874, 7 May 2025
- National Audit Office, *An analysis of the asylum system*, December 2025
- National Audit Office, *Home Office: The cancellation of Bicester Accommodation Centre*
- Committee of Public Accounts, *Asylum accommodation and UK–Rwanda partnership*, 2024
- Home Affairs Committee, *The Home Office's management of asylum accommodation*, HC 580, 2025
- Independent Chief Inspector of Borders and Immigration, inspection of contingency asylum accommodation, November 2023 – June 2024
- Ministerial statement on asylum accommodation, House of Commons, 25 June 2026
- Written parliamentary answer, Ministry of Defence, UIN 16355 (Calum Miller MP, tabled 6 July 2026; answered by Luke Pollard MP, 9 July 2026), confirming the Ministry was first informed of proposals to use MOD Bicester for asylum accommodation in November 2025
- Statement on Thames Water, House of Commons, 16 June 2026

- Local Government Association statement on hotel closures and alternative accommodation, 26 June 2026

C.7 Applicant and site-specific material

- Home Office, *MoD Bicester (site A), Oxfordshire: factsheet*, version 1.0, published 30 June 2026
- Cherwell District Council, "Home Office announces plans for new asylum housing centre near Bicester", June 2026
- 2010 Land Quality Assessment for A Site and C Site, DSDC Bicester (Entec UK Limited for Defence Estates)
- Inspector's report into the Bicester Accommodation Centre, 18 April 2003, and the decision letter of 18 August 2003, as recorded in *R (Cherwell DC) v FSS* [2004] EWHC 724 (Admin)

C.8 Water industry and environmental material

- Thames Water, Drainage and Wastewater Management Plan and subsequent updates
- Bicester Sewage Treatment Works growth scheme (completed 2022) design data
- Ofwat, PR24 final determination for Thames Water, December 2024
- Environment Agency Event Duration Monitoring data and Storm Overflow Assessment Framework
- Natural England SSSI citations for Arncott Bridge Meadows, Wendlebury Meads and Otmoor
- Berks, Bucks and Oxon Wildlife Trust material on the Upper Ray Meadows and the Bernwood Forest and Ray Valley Living Landscape

C.9 Note on sources

C.9.1 Where this representation attributes a statement to a source, the attribution is to the source's own published words or findings, paraphrased. Where PPC has been unable to verify a figure or statement against a primary source, it has been removed from the body of this representation and recorded at Appendix F rather than repeated. PPC will supply full document references and, where appropriate, copies, on request.

C.10 The application documents

C.10.1 The following documents were submitted by the Applicant and are relied upon in this Version 4.0. Author names are absent from every technical report; only initials or role titles are given, which bears on paragraph 190 of the Framework.

Document	Reference and revision	Date	Author identified
Urgent Crown Development planning application form	-	Signed 25 June 2026	Applicant: Secretary of State for the Home Department
Covering letter	-	6 July 2026	No; "On behalf of the Secretary of State"
Article 4 Application Notice	-	16 June 2026	No
Article 5 Compliance Statement	-	25 June 2026	No
Bicester: Statement on National Importance	-	Undated	No
Planning Proposal Statement	MOD015, Revision D, "Final for submission"	6 July 2026	No; reviewer sign-off fields blank
Site Location Plan	BIC-DR-AR-100105-P01	Not legible	Not legible
Site Parameters Plan	BIC-DR-AR-100107-P01 Rev. 2	Not legible	Not legible
Site Demolition Plan	BIC-DR-AR-100108-P01	Not legible	Not legible
Existing Site Plan	BIC-DR-AR-100106-P01	Not legible	Not legible
Transport Assessment	D02, Final	7 June 2026	No; initials only
Travel Plan	Revision 2, Draft	5 June 2026	No; initials only
Flood Risk Assessment	P02, Second Issue	June 2026	No; prepared, checked and approved fields blank
Drainage Design Statement	ONF-15-RP-CV-100004	June 2026	No
Utilities and Infrastructure Assessment	ONF-15-RP-CV-100003	June 2026	No
Preliminary Geo-environmental and Geotechnical Assessment	P02, Final	May 2026	No; initials only
Preliminary Ecological Appraisal	V1, Final, First Issue	13 May 2026	No
Habitats Regulations Assessment Screening	Nettlefire, Site MOD015	Commissioned 26 February 2026; cited elsewhere as 10 April 2026	No; author, reviewer and verifier fields blank

Document	Reference and revision	Date	Author identified
Natural England advice (1)	DAS/A024337, Your Ref MOD015	4 June 2026	Signed "Major Planning Casework Team"
Natural England advice (2)	DAS/A024337, Your Ref **MOD008**	23 July 2026	Signature redacted
Archaeological and Heritage Desk-Based Assessment	Revision 0, Issue	May 2026	Role titles only
Landscape and Visual Statement	P02, Final Issue	21 May 2026	Role titles only
Preliminary UXO Risk Assessment	Site 015	31 March 2026	No; commissioned by the Government Property Agency
Fire Safety Strategy	RIBA 2, UK0045137.3823	May 2026	No
Equality Impact Assessment	Section 1: MOD015 (Bicester)	Sign-off 28 May 2026	No
EIA Screening Direction Request	Annex 1: EIA Screening Opinion Report	3 July 2026	No; "Senior Consultant Associate"
EIA Screening Direction and written statement	PCU/EIASCR/C3105/3378828	26 August 2026	Planning Casework Unit, officials on behalf of the Secretary of State
Notification to the local planning authority	PCU/RARE/J1725/3378659	20 July 2026	Signatory redacted
Letter, Minister of State to Calum Miller MP	PCU/RARE/J1725/3378659	13 July 2026	Matthew Pennycook MP
Noise Technical Note	**Not submitted with the application**	Undated in the version reviewed	No; initials only
Air Quality Screening Technical Note	Issue 1, First Issue, Nettlefire MOD015	26 June 2026	No; initials only

C.10.2 PPC also relies on its own companion report, *Analysis of the Submitted Application: Information Adequacy, Validation Shortfalls and Correlation with the Council's Grounds of Objection*, Version 1.0, 2 September 2026, and on Cherwell District Council's adopted Local Validation Checklist (Appendix 2, March 2024).

Appendix E: Schedule of New Authorities, Legislation, Policy and Guidance Incorporated

E.1 This schedule lists material incorporated into Version 2.0 which did not appear in the draft of 27 July 2026, with the proposition it supports and the section in which it is deployed.

E.2 Primary legislation

Provision	Proposition supported	Section
TCPA 1990 s.293(2), (2A)	Definition of "appropriate authority"; requirement to demonstrate a sufficiently high degree of Crown interest or control	2.4, 4.2
TCPA 1990 s.293B(11)	Sensitive information directions and their effect on disclosure	4.2.1, 6.2.1
TCPA 1990 s.294(1)	Restriction on enforcement in respect of development by or on behalf of the Crown	3.5
TCPA 1990 s.299A	Crown planning obligations; the correct mechanism for securing contributions	3.5.3(d), 19.2
TCPA 1990 s.70(2)	Duty to have regard to the development plan and other material considerations	7.1.1
TCPA 1990 Sch. 7A	Biodiversity gain condition	10.1, 10.2
PCPA 2004 Part 7	Application of the planning Acts to the Crown; the change since 2003	3.5.1
Planning and Infrastructure Act 2025, Part 3	Environmental Delivery Plans and the Nature Restoration Fund	10.4.3
Environment Act 2021 s.102, s.104	General biodiversity duty; Local Nature Recovery Strategies	10.1, 10.4.2
Environment Act 2021 Sch. 14	Insertion of Sch. 7A into TCPA 1990	10.1
Wildlife and Countryside Act 1981 s.28G	Duty on public bodies in relation to SSSIs - binding on the Secretary of State in determining this application	10.1
NERC Act 2006 s.40	General biodiversity duty	10.1
Environmental Protection Act 1990 Part 2A	Contaminated land regime and its statutory guidance	11.2
Immigration and Asylum Act 1999 ss.95, 96	The statutory duty under which accommodation is provided; the basis of the public interest relied on by the courts	4.2.2, 14.2
Water Industry Act 1991 ss.2, 94, 106	Secretary of State's duties; sewerage undertaker's duty; right of connection - and why it is not evidence of capacity	9.2.9, 9.2.14
Equality Act 2010 s.149	Public sector equality duty	17
Planning (LBCA) Act 1990 ss.16, 66, 72	Heritage duties	12.4.2

E.3 Secondary legislation

Provision	Proposition supported	Section
SI 2025/411 arts. 4, 5	Owner and agricultural tenant notice, and the 7-day period	2.4.2
SI 2025/411 art. 6(1)(c)(iv), (v)	The two statements required to accompany the application	4.1.1, 20.2
SI 2025/411 arts. 9, 10	Publicity; the **permissive** nature of the representation provision	6.2.1–6.2.3
SI 2025/411 art. 11(3)(c), (4)	The 30-day representation and site-display periods for EIA applications	6.2.8
SI 2025/411 art. 12	Prohibition on disclosure of sensitive information	4.2.1, 6.2.1
SI 2025/411 art. 13(1)	The seven prescribed consultees - and the bodies omitted	6.2.4–6.2.6
SI 2025/411 arts. 13(3), 15(3), 16	"Substantive response", including a bare "no comment", permitting early determination	6.2.5, 6.5.1(3)
SI 2025/411 art. 14(1)(b), (2)(b)	Engagement of the Sch. 4 DMPO consultees, and the 30-day period, for EIA applications only	6.2.8
SI 2025/411 art. 17	The 30-day minimum before determination, for EIA applications only	6.2.8
SI 2025/411 art. 18(2)	Duty to give reasons	2.4.5
SI 2025/411 art. 19	Publication of the decision and of representations	2.4.5, 6.5.1(9)
SI 2025/409 arts. 16, 17, 20, 21, 23	The standard route's guaranteed 21-day (30-day EIA) publicity and consultation periods - the comparator	6.2.2, 5.7
SI 2025/410	Hearings and inquiries procedure under the standard route	5.7.2
SI 2025/412	Consequential amendments to the EIA Regulations 2017 and reg. 70 of the Habitats Regulations	2.4.2, 16.2.1
SI 2025/430	Commencement of s.109 and Sch. 10 LURA 2023 on 1 May 2025	2.4.1
SI 2025/433	CIL amendments consequential on the Crown Development routes	2.4.2, 9.6.4
EIA Regulations 2017, Sch. 2 para 10(b)	The applicable Schedule 2 category and threshold	16.2.3
EIA Regulations 2017, Sch. 3	The selection criteria for screening	16.2.4, 16.3
EIA Regulations 2017, reg. 18(3)(d)	Mandatory description of reasonable alternatives in an environmental statement	15.1.4(b)
Habitats Regulations 2017, regs 9(3), 43, 44, 55, Sch. 2	European protected species obligations and licensing	10.1
Habitats Regulations 2017, reg. 63	Appropriate assessment - expressly **not** asserted to be engaged	10.1
DMPO 2015, Sch. 4	The wider statutory consultee list engaged only on EIA applications	6.2.6
GPDO 2015, Sch. 2 Part 19 Class Q	The mechanism used at Wethersfield and Scampton; the definition of "emergency"	4.2.3

Provision	Proposition supported	Section
Water Environment (WFD) Regulations 2017	Water body objectives for the receiving environment	9.2.12
BNG amendment regulations (in force 6 August 2026)	The 0.2 ha and five-year temporary exemptions - neither of which assists the Applicant	10.2.2–10.2.3

E.4 Case law

Authority	Proposition	Section
R (Cherwell DC) v First Secretary of State [2004] EWHC 724 (Admin)	The 2003 Inspector's conclusions; the 2003 decision letter; previously developed land; alternatives; Crown immunity as it then stood	2.1.3, 3, 8.2, 15.1.3
Braintree DC v SSHD [2023] EWHC 1076 (KB)	s.187B injunction struck out for want of s.296A(2) consent	5.6.1
Braintree DC v SSHD [2023] EWCA Civ 727, [2023] 1 WLR 3087	Appeal dismissed	5.6.1
R (Clarke-Holland, WLDC and BDC) v SSHD [2023] EWHC 3140 (Admin)	Class Q and EIA screening challenges dismissed; the "emergency" analysis	4.2.3, 5.6.1
TG and others v SSHD [2025] EWHC 596 (Admin)	Unlawful accommodation of three of four lead claimants; reasonable adjustments breach; systemic PSED breach; distinguishing *NB*	5.6.1, 14.2, 17.1.3
NB and others v SSHD [2021] EWHC 1489 (Admin)	Napier Barracks; the comparator distinguished in *TG*	14.2.3
Epping Forest DC v Somani Hotels Ltd (2025)	Injunctive relief refused; the weight given to the s.95 duty	5.6.1
Tesco Stores Ltd v Dundee CC [2012] UKSC 13	Interpretation of development plan policy is a matter of law	7.1.2
Suffolk Coastal DC v Hopkins Homes Ltd [2017] UKSC 37	The tilted balance does not displace s.38(6); the Framework is not to be read as statute	7.6.3
South Bucks DC v Porter (No 2) [2004] UKHL 33	The standard of reasons	2.4.5
R (Champion) v North Norfolk DC [2015] UKSC 52	Properly informed screening	16.2.5
Berkeley v SSETR [2001] 2 AC 603	EIA requirements cannot be satisfied by an informal equivalent; participation is a substantive right	16.2.5
R (Moseley) v Haringey LBC [2014] UKSC 56; *R v Brent LBC ex p Gunning*	The requirements of lawful consultation	6.3.1
R (Bracking) v SSWP [2013] EWCA Civ 1345	PSED must be discharged in substance, with rigour and an open mind, before the decision	17.1.2
R (Jones) v North Warwickshire BC [2001] EWCA Civ 315	Alternative sites relevant only in exceptional circumstances - **adverse authority, addressed**	15.1.2
Trusthouse Forte Hotels v SSE (1986) 53 P&CR 293	Examples of "conspicuous adverse effects"	15.1.2
Lord Advocate v Dumbarton DC [1990] 2 AC 580	Crown immunity as it stood before Part 7 PCPA 2004	3.5.1

E.5 Policy, guidance and standards

Source	Proposition	Section
PPG Para 027 (44-027-20250512)	The urgency test, including the comparative "other application routes" requirement and the evidence-of-consequence requirement	5.1.2
PPG Para 043 (44-043-20250512)	The four national importance criteria	4.1.2
PPG Para 044 (44-044-20250512)	Pre-application engagement expectations	6.4.2
PPG Para 049 (44-049-20250512)	The standard route's 21/30-day periods and Sch. 4 consultation - the comparator	6.2.2
PPG Para 050 (44-050-20250512)	The LPA's role; strong encouragement of pre-application engagement	6.4.2
PPG Para 053 (44-053-20250512)	BNG applies to Crown Development; the decision notice identifies the BGP authority	10.1, 10.2.4
PPG Para 054 (44-054-20250512)	CIL liability	9.6.4
PPG Paras 055, 064	EIA applies to both routes; screening and scoping directions to the Secretary of State	16.2.1
PPG Para 057 (44-057-20250512)	Power to request further information where there is insufficient information for an informed planning judgement	6.5.1(7)
PPG Para 062 (44-062-20250512)	Power to appoint an independent technical advisor	6.5.1(6)
WMS 13 February 2025 (HCWS454)	The national importance and urgency principles; the safeguards and transparency intended	4.1.2, 4.3.2(a)
Guidance on planning propriety: planning casework decisions, Annex B	Propriety in handling Crown and Urgent Crown Development proposals	2.4.3
NPPF (December 2024) paras 11, 48, 115, 116, 124(c), 136, 173, 189–191, 198, 207	As deployed throughout	7, 8, 11, 12, 13, 16
Draft NPPF (16 December 2025)	Status as an unadopted consultation draft; the fairness point if published before determination	7.5.3–7.5.4
GLVIA3; ILP GN01; BCT/ILP bat lighting guidance	Landscape, visual and lighting assessment standards	12.2, 12.3
CIEEM EcIA Guidelines; LCRM guidance	Ecological and land contamination assessment standards	10.5, 11.3
Manual for Streets; *Inclusive Mobility*; LTN 1/20	Highway and active travel design standards	8.5.1

E.6 Evidence, audit and inspection

Source	Proposition	Section
Home Office factsheet, MoD Bicester (site A), 30 June 2026	Feasibility assessments of several months; minimum ten-year use; self-sufficiency; security regime; initial-processing function	2.3, 5.2
Ministerial statement, 25 June 2026	Three sites, c.3,750 places; hotel use more than halved; Cameron Barracks ruled out	5.4.2, 5.5
Cherwell District Council statement, June 2026	No prior engagement or consultation with the district	6.4.1
LGA statement, 26 June 2026	Councils should be engaged and their consent obtained well in advance	6.4.3
Statement on Thames Water, House of Commons, 16 June 2026	Concerns as to deferral of investment including wastewater treatment	9.2.8
Bicester STW growth scheme (completed 2022)	Design horizon 2026; PE 49,500 to 67,840	9.2.2
NAO, *Investigation into asylum accommodation*, March 2024	Programme cost; set-up cost escalation; £46m more than hotels; red-rated assurance; move away from sites above 1,000 places	15.2.1
NAO, *The Home Office's asylum accommodation contracts*, HC 874, May 2025	Safeguarding outcome data not systematically collected; no safeguarding performance deductions	14.3.1
NAO, *An analysis of the asylum system*, December 2025	2024-25 expenditure	5.4.4
NAO, *Home Office: The cancellation of Bicester Accommodation Centre*	£28m spent; cancellation June 2005; 14-month slippage; applications halved Oct 2002 – Sept 2003	3.4.3
Home Affairs Committee, HC 580, 2025	Adequacy and safeguarding failures; uneven distribution; Scampton cancellation; Northeye	6.4.3, 14.3.1, 15.2.1
ICIBI inspection, November 2023 – June 2024	Highly variable quality; too many placed in inadequate or deeply unsuitable accommodation	14.3.1
Natural England SSSI citations; Cherwell Green and Blue Infrastructure Strategy; BBOWT Living Landscape	The designated site network and the Otmoor/Bernwood/Ray focus area	9.2.11, 10.4.1

E.7 Material incorporated in Version 4.0

Source	Proposition	Section
PPG Paragraph 051 (Reference ID 44-051-20250512)	An application under the Crown Development route will be determined in accordance with the development plan unless material considerations indicate otherwise	7.8.2
Cherwell District Council, Local Validation Checklist, Appendix 2 (March 2024)	The information a competent local planning authority would require for a proposal of this kind	Appendix F
NPPF Annex 3, flood risk vulnerability classification	Residential institutions, including hostels, are "More Vulnerable"	13.4.2
Screening direction and written statement, 26 August 2026	The proposal is not EIA development; the reasons given	6.6, 16.6
Natural England DAS advice, 4 June 2026 and 23 July 2026	Potential significant effects on Arncott Bridge Meadows SSSI; hydrological connection cannot be ruled out; re-consultation required	10.6.9-10.6.12
Drainage Design Statement, June 2026	Foul solution undetermined; Approach 3 selected; no outfall; no permit; Phase 1 unattenuated; odour assessment required	9.8, 13.4, 15A.1
Utilities and Infrastructure Assessment, June 2026	No capacity confirmation; 2.16 MVA; existing electrical infrastructure cannot be relied upon; no gas	9.8.7-9.8.10, 15A.2
Preliminary Geo-environmental and Geotechnical Assessment, May 2026	Desk study only; no intrusive investigation; asbestos and munitions handling identified	11.4
Preliminary Ecological Appraisal, 13 May 2026	Single-visit walkover; no historic surveys identified; nine further surveys outstanding	10.6
Preliminary UXO Risk Assessment, 31 March 2026	Four elevated risk factors; munitions storage cannot be discounted; assesses a scheme for 3,510 persons on 50.5 ha; detailed risk assessment not possible	11.4.9-11.4.12, 5A.3.4
Transport Assessment, 7 June 2026	No pre-application scoping with the highway authority; Wethersfield trip data; residents free to come and go; no off-site mitigation	8.6
Equality Impact Assessment, 28 May 2026	Nine protected characteristics addressed; no case law cited; disability addressed by exclusion; provisional and unpublished	14.6.3, 17.3
Statement on National Importance	Long-term and permanent framing; self-set programme deadline; alternative routes but not alternative sites	4.4, 5.8, 15.5, 15A.3
Landscape and Visual Statement, 21 May 2026	A Statement, not a GLVIA3 assessment; leaf-off single visit; no lighting assessment	12.5
Archaeological and Heritage Desk-Based Assessment, May 2026	Desk-based only; moderate to high archaeological potential; no field evaluation	12.5.9-12.5.11
Fire Safety Strategy, May 2026	Outline only; structural fire resistance and space separation undetermined; fire service not consulted	9.8.12

Appendix F: Evidence and Research Acquisition Programme

F.1 This appendix is referred to throughout Versions 2.0 and 3.0 of this representation but was inadvertently omitted from both. It is supplied here, and is updated to record, against each item, whether the application documents published on 2 September 2026 have answered it.

F.2 The status column uses four terms. **Answered** means the application supplies the item. **Partly answered** means it supplies part of it. **Outstanding** means it does not. **Superseded** means the item no longer arises.

F.3 Procedural and jurisdictional

#	Item sought	Source of request	Status
F3.1	The Statement of national importance and urgency under article 6(1)(c)(iv)	4.1.1, 20.2.1	**Answered** in form. The Statement does not quantify this Site's contribution to the national requirement (4.4)
F3.2	The statement of planning acceptability under article 6(1)(c)(v)	4.1.1, 20.2.1	**Answered** by the Planning Proposal Statement, subject to 7.8 and 1.4.7
F3.3	Confirmation whether a direction under section 293B(11) has been sought or made	4.2.1, 6.5.1	**Outstanding**
F3.4	The forecast of asylum accommodation demand by type to 2036, and this Site's contribution year by year	5.4.5	**Outstanding**
F3.5	The assessed consequence of determination under the standard route, in months and in accommodation places	5.4.5, 15.4.1	**Outstanding**
F3.6	The two items of internal Home Office management information relied upon in the Statement on National Importance	4.4.6 (new)	**Outstanding**
F3.7	The written statement of reasons accompanying the screening direction	6.6.7 (new)	**Outstanding**
F3.8	The date on which the decision in principle to proceed with Site A was taken, and the date on which each technical assessment was commissioned	5A.8.1 (new)	**Outstanding**

F.4 Development plan and site

#	Item sought	Source of request	Status
F4.1	Confirmation whether a made neighbourhood development plan applies to the Site	7.2.2	**Outstanding**
F4.2	A policy-by-policy statement of compliance with the adopted development plan	7.4.2, Appendix B	**Outstanding.** Eleven engaged policies are recited and not applied (7.8.4)
F4.3	Up-to-date register entries for titles ON255160 and ON242021, and confirmation which of the 2003 conditions bind the land now proposed	3.4.5	**Outstanding**
F4.4	The maximum bed capacity applied for	16.5.1	**Answered.** 1,256 bedspaces
F4.5	A schedule of every parameter the Applicant invites the Secretary of State to fix	16.6.9 (new)	**Outstanding**
F4.6	Confirmation of the Community Infrastructure Levy position	9.6.4	**Outstanding**
F4.7	Confirmation whether any part of the Site remains in use for search, explosive ordnance disposal training or other Ministry of Defence-related activity, notwithstanding the factsheet's statement that it is no longer in active use	2.3.1 (new)	**Outstanding. Unverified report from a former site worker; not adopted as fact.**

F.5 Highways and access

#	Item sought	Source of request	Status
F5.1	The primary STATS19 personal injury collision record for the B4011 and Widnell Lane corridor	8.1.2	**Partly answered.** Three collisions identified; source, period and network extent not stated (8.6.3)
F5.2	A Transport Assessment based on observed data from a comparable operational site	8.3.3	**Answered**
F5.3	Swept-path analysis at constrained points on the B4011 and Widnell Lane	8.3.3	**Partly answered.** Site access only
F5.4	Modelling of night-time and shift-change movements	8.3.3	**Outstanding**
F5.5	Assessment of pedestrian and cycle desire lines and their safety in darkness and winter	8.3.3	**Outstanding** (8.6.4)
F5.6	Assessment of public transport adequacy and the funding of any enhancement	8.3.3	**Outstanding**
F5.7	Cumulative assessment with committed development in the Bicester area	8.3.3	**Outstanding**
F5.8	Agreement of the Transport Assessment with Oxfordshire County Council	8.3.3	**Outstanding, and expressly not undertaken**
F5.9	Confirmation of the status of the Routeing Agreement of 19 January 2010	8.1.3	**Outstanding**
F5.10	A construction traffic assessment and an agreed Construction Traffic Management Plan	8.6.10 (new)	**Outstanding**
F5.11	Assessment of foul effluent tanker movements for the Phase 1 cesspool	8.6.10 (new)	**Outstanding**
F5.12	Reconciliation of the network extent shown in the STATS19 collision-search diagram against the walking and cycle-catchment radii applied elsewhere in the Transport Assessment's accessibility analysis	8.6.3 (new)	**Outstanding**

F.6 Infrastructure and utilities

#	Item sought	Source of request	Status
F6.1	Confirmation whether Site A would discharge to Bicester Sewage Treatment Works, the connection point, and any reinforcement required	9.2.13	**Outstanding.** A new on-site works is proposed instead
F6.2	Current actual dry weather flow, flow to full treatment and population equivalent loading at Bicester Sewage Treatment Works against permitted and design capacity	9.2.13	**Outstanding**
F6.3	Wet-weather and dry-weather headroom after all committed development	9.2.13	**Outstanding**
F6.4	The additional average and peak flows Site A would generate, with assumptions stated	9.2.13	**Answered.** 1,386 design population at 140 l/p/d, 20 per cent infiltration allowance, peaking factor 2.5
F6.5	Whether an on-site treatment solution is proposed, and its consenting position, receiving watercourse and resilience	9.2.13	**Partly answered.** One is proposed. No outfall, no permit, no resilience assessment (15A.1)
F6.6	Whether connection would increase sewer surcharge, property flooding or storm spill	9.2.13	**Outstanding**
F6.7	The programme and funding status of any further Bicester growth scheme	9.2.13	**Outstanding**
F6.8	Thames Water's formal written position as sewerage undertaker	9.2.13	**Outstanding.** No enquiry has been made
F6.9	The Environment Agency's formal position on the receiving water bodies	9.2.13	**Outstanding**
F6.10	Assessed potable water demand, supply point, reinforcement, and Thames Water's position as water undertaker	9.3.2	**Partly answered.** Demand assumption stated at 140 l/p/d, contrary to Policy ESD 3. No capacity confirmation and no flow and pressure test
F6.11	The Integrated Care Board's response on the five matters at 9.4.2	9.4.2	**Outstanding**
F6.12	Responses from Thames Valley Police, Oxfordshire Fire and Rescue Service and South Central Ambulance Service	9.5.1	**Outstanding**
F6.13	Electricity and gas demand, connection points, reinforcement and the distribution network operators' positions	9.6.1	**Partly answered.** 2.16 MVA estimated; no gas; network capacity unknown; no operator response
F6.14	Waste management arrangements and consultation of the waste authorities	9.6.1	**Outstanding**
F6.15	The operator, voltage, easement extent and remaining developable area in respect of the overhead lines	9.6.7	**Partly answered.** Clearances stated; developable area not stated

F.7 Ecology

#	Item sought	Source of request	Status
F7.1	Biodiversity gain information under Schedule 7A, including pre-development value and calculation date	10.2.4	**Outstanding.** Nothing has been submitted
F7.2	Confirmation that no degraded baseline date is proposed	10.2.4	**Outstanding**
F7.3	Confirmation that the current statutory metric is used	10.2.4	**Outstanding**
F7.4	The intended route to gain, with deliverability and 30-year maintenance and monitoring	10.2.4	**Outstanding**
F7.5	Identification of the planning authority for the Biodiversity Gain Plan	10.2.4	**Outstanding**
F7.6	Multi-season, appropriately licensed survey covering the nine matters at 10.5.1	10.5.1	**Outstanding.** Nine surveys remain to be done (10.6.7)
F7.7	Assessment of the likelihood of a regulation 55 licence being granted	10.5.2	**Outstanding**
F7.8	Legible versions of sections 3 and 4 and Appendix B of the Preliminary Ecological Appraisal	1.4.7 (new)	**Outstanding**
F7.9	Natural England's statutory consultation response on the actual drainage strategy	10.6.14 (new)	**Outstanding**

F.8 Land quality and ground conditions

#	Item sought	Source of request	Status
F8.1	A conceptual site model constructed for the proposed residential-equivalent end use	11.3.1	**Not legible** in the version published (11.4.6)
F8.2	Residual risk from historic fuel, oil and solvent storage, including tanks, interceptors and fuelling points	11.3.1	**Outstanding**
F8.3	Implications of the artesian aquifer conditions for foundation, drainage and piling design	11.3.1	**Outstanding**
F8.4	A controlled waters risk assessment	11.3.1	**Outstanding**
F8.5	Asbestos risk and the management strategy for demolition and refurbishment	11.3.1	**Partly answered.** Asbestos confirmed present; the April 2026 survey is not submitted
F8.6	An unexploded ordnance risk assessment appropriate to the Site's history	11.3.1	**Partly answered.** A preliminary assessment exists but was prepared for a different scheme and states that a detailed assessment is not possible (11.4.9-11.4.12)
F8.7	A radiological survey of building A33 and any comparable buildings	11.3.1	**Outstanding**
F8.8	Ground gas monitoring where made ground is present	11.3.1	**Outstanding**
F8.9	A remediation strategy and verification plan calibrated to residential-equivalent use	11.3.1	**Outstanding**
F8.10	A Phase 2 intrusive ground investigation	11.4.14 (new)	**Outstanding.** None has been carried out
F8.11	Identification of the competent person under NPPF paragraph 190	11.4.14 (new)	**Outstanding**

F.9 Landscape, lighting and heritage

#	Item sought	Source of request	Status
F9.1	A Landscape and Visual Impact Assessment to GLVIA3 addressing the eight matters at 12.3.1	12.3.1	**Partly answered.** A Statement has been produced; none of the eight matters is addressed as requested
F9.2	An obtrusive light assessment applying ILP Guidance Note 1, with the environmental zone identified	12.3.1	**Outstanding.** No lighting information of any kind
F9.3	A lighting strategy and lux contour plan	12.2, 19.3.1	**Outstanding**
F9.4	Identification and assessment of designated and non-designated heritage assets, with desk-based assessment and, if appropriate, evaluation	12.4.2	**Partly answered.** Desk-based assessment produced; no field evaluation; on-site military structures not assessed as non-designated assets
F9.5	A landscape masterplan, planting scheme and landscape management plan	12.5.13 (new)	**Outstanding**

F.10 Flood risk and drainage

#	Item sought	Source of request	Status
F10.1	Flood risk from all sources over the lifetime, with current climate change allowances, river basin district and epoch	13.3.1	**Partly answered.** Sources assessed; no allowance, district, epoch or lifetime stated
F10.2	The sequential test	13.3.1	**Outstanding**
F10.3	The exception test if required	13.3.1	**Not carried out**; the vulnerability of the use proposed is not classified
F10.4	The existing surface water regime, impermeable area and outfall	13.3.1	**Outstanding.** Routing undetermined; outfalls assumed; no CCTV survey
F10.5	The proposed strategy with infiltration testing and restriction to greenfield or betterment rates	13.3.1	**Partly answered.** No infiltration testing; greenfield rates not achieved in Phase 1
F10.6	Interaction with artesian groundwater and the risk of mobilising contamination	13.3.1	**Outstanding**
F10.7	Effect on flood risk elsewhere, including downstream at Arncott Bridge	13.3.1	**Outstanding.** No hydraulic modelling
F10.8	Safe access and egress in flood conditions	13.3.1	**Outstanding**
F10.9	A flood evacuation and emergency response plan agreed with the Environment Agency and the emergency services	13.3.1	**Outstanding**
F10.10	Maintenance and adoption arrangements for sustainable drainage features	13.3.1	**Outstanding**, contrary to Policy ESD 7
F10.11	Overheating risk, water efficiency and the energy strategy over the operational life	13.3.2	**Outstanding.** No energy statement, BREEAM assessment or feasibility assessments

F.11 Public health, safeguarding and social impact

#	Item sought	Source of request	Status
F11.1	Demonstrated engagement with the six bodies at 14.5.1	14.5.1	**Outstanding**
F11.2	The multi-agency forum arrangements, incident reporting and escalation protocol, and safeguarding policy	14.5.2	**Partly answered** in outline; the full Operational Management Plan does not exist
F11.3	An Equality Impact Assessment addressing the ten matters at 17.2.1	17.2.1	**Partly answered.** See 17.3
F11.4	The maximum length of stay and how it is to be secured	14.6.7 (new)	**Outstanding**
F11.5	Odour and noise modelling for the proposed wastewater treatment works	14.6.7 (new)	**Outstanding**

F.12 Need, alternatives and deliverability

#	Item sought	Source of request	Status
F12.1	The site selection methodology, sites considered, criteria applied and reasons for preferring Site A	15.4.1	**Outstanding**
F12.2	The current value for money or cost-benefit analysis and its sensitivity to occupancy assumptions	15.4.1	**Outstanding**
F12.3	The assumed capacity, phasing profile and occupancy over the operational life	15.4.1	**Partly answered.** Capacity and phasing stated; occupancy profile not
F12.4	The procurement route for the operating contract, its duration and break provisions	15.4.1	**Outstanding**
F12.5	The position at the end of the operational life, including restoration	15.4.1	**Outstanding.** "There are no definitive plans for the decommissioning phase"
F12.6	Responses to PPC's requests under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004	15.4.2	Awaited; PPC will supply them as supplementary evidence

F.13 Documents relied upon by the Applicant but not submitted

#	Document	Where relied upon	Status
F13.1	Tree survey	Planning Proposal Statement 7.40-7.44, which recites its categorised results	**Outstanding**
F13.2	Security Management Plan	Planning Proposal Statement 7.56	**Outstanding**
F13.3	Operational Management Plan	Planning Proposal Statement 4.1	**Does not yet exist**
F13.4	Asbestos Demolition Survey, April 2026	Secretary of State's written statement	**Outstanding**
F13.5	Site Feasibility Study (2025)	Habitats Regulations Assessment Screening 1.7	**Outstanding**
F13.6	Home Office Scoping Report (2026)	Habitats Regulations Assessment Screening 1.7	**Outstanding**
F13.7	Land Quality Assessment, May 2010, and application 11/01494/OUT	Secretary of State's written statement	**Outstanding**, and absent from the Applicant's planning history

Appendix G: Chronology of the Application and its Supporting Documents

G.1 This appendix supports Section 5A. Every entry is taken from a dated document submitted with the application, from the public record, or from a parliamentary source. Where a document bears only a month, that is stated.

Date	Event or document	Source
21 November 2025	Enquiry submitted to National Grid Electricity Transmission in respect of the Site; work type recorded as "Commercial/industrial"	Utilities and Infrastructure Assessment, Appendix C
November 2025	The Ministry of Defence "was first informed of proposals to use MOD Bicester for asylum accommodation"	Written parliamentary answer, UIN 16355, answered 9 July 2026
26 February 2026	Habitats Regulations Assessment screening commissioned by the Home Office	Habitats Regulations Assessment Screening
23 February 2026 **or** 11 March 2026	Heritage walkover survey; the assessment gives both dates	Archaeological and Heritage Assessment, sections 4.1 and 9
25 February 2026	Drainage site inspection with the Ministry of Defence site team; Zone 1 reported as prone to frequent surface water flooding; existing systems found non-operational	Drainage Design Statement, sections 4.1 and 4.2
26 February 2026	Flood risk site visit	EIA Screening Direction Request
March 2026	Biological records data search obtained	Preliminary Ecological Appraisal, section 2.2
26 March 2026	Landscape and visual site visit, in leaf-off conditions	Landscape and Visual Statement, section 1.4.3
26 March 2026	Highways site visit	EIA Screening Direction Request
26 March to 10 April 2026	Extended habitat survey, stated to be "just outside the optimal survey window"	Preliminary Ecological Appraisal, sections 2.3.1 and 2.4
31 March 2026	**Preliminary UXO Risk Assessment issued**, assessing accommodation for **3,510 service users** on an area of investigation of **50.5 hectares**, and stating that "As a construction project has not yet been defined for this site, it is not possible to complete a UXO Detailed Risk Assessment"	Preliminary UXO Risk Assessment, sections 1.2, 2.2 and 3.2
2 April 2026	Commercial environmental database report obtained	Preliminary Geo-environmental and Geotechnical Assessment, section 1.5
April 2026	Preliminary Geo-environmental and Geotechnical Assessment, Revision P01, First Issue	Document control
April 2026	Asbestos Demolition Survey undertaken; asbestos-containing material identified. **Not submitted**	Secretary of State's written statement

Date	Event or document	Source
10 April 2026	Bicester Habitats Regulations Assessment report	Natural England letter, 4 June 2026
16 April 2026	Automatic traffic count installed at RAF Wethersfield for seven days	Transport Assessment, section 3.10.4
27 and 28 April 2026	Environment Agency flood mapping accessed	Planning Proposal Statement, Figures 5 to 8
30 April 2026	Landscape and Visual Statement, Revision P01, First Issue	Document control
7 May 2026	Transport Assessment Revision D01, Draft; Travel Plan Revision 1, Draft	Document control
May 2026	Preliminary Geo-environmental and Geotechnical Assessment, Revision P02, Final	Document control
May 2026	Archaeological and Heritage Desk-Based Assessment, Revision 0	Document control
May 2026	Fire Safety Strategy, RIBA Stage 2	Document control
May 2026	Flood Risk Assessment, Revision P01, First Issue	Document control
13 May 2026	Preliminary Ecological Appraisal, Version 1, Final	Document control
18 May 2026	Natural England Discretionary Advice Service quotation and agreement	Natural England letter, 4 June 2026
21 May 2026	Landscape and Visual Statement, Revision P02, Final Issue	Document control
21 May 2026	Home Office consults Natural England on the Habitats Regulations Assessment report and the Preliminary Ecological Appraisal	Natural England letter, 4 June 2026
28 May 2026	Equality Impact Assessment signed off; review date six months; publication "Not decided yet"	Equality Impact Assessment
4 June 2026	Planning Proposal Statement, Draft issue	Revision history
4 June 2026	**Natural England advises** that the proposal "could have potential significant effects on Arncott Bridge Site of Special Scientific Interest", requires further information on hydrological impact pathways, and states "Please re-consult Natural England once this information has been obtained"	Natural England letter, DAS/A024337
5 June 2026	Travel Plan Revision 2 - **still marked Draft**	Document control
7 June 2026	Transport Assessment Revision D02, Final. It records that "no pre-application scoping discussions have been held with the local planning and highway authorities"	Document control; section 1.4.2
June 2026	**Drainage Design Statement issued.** Approach 3, a new on-site wastewater treatment works discharging to a watercourse, is selected because the feasibility of the alternatives cannot be confirmed. Phase 1 "cannot be restricted to greenfield rates"	Drainage Design Statement, sections 8.2 and 9.2
June 2026	Utilities and Infrastructure Assessment issued; "no stakeholder engagement"; existing electrical infrastructure "cannot be relied upon"	Sections 4.2 and 4.5
June 2026	Flood Risk Assessment Revision P02, "Second Issue following client approval"	Document control

Date	Event or document	Source
16 June 2026	**Notice under article 4 of SI 2025/411 served on the Ministry of Defence,** describing an application to accommodate up to 1,256 service users - **nine days before the public announcement**	Article 4 Application Notice
16 June 2026	The Secretary of State for Environment, Food and Rural Affairs makes a statement to the House of Commons on Thames Water, warning of possible deferral of wastewater treatment investment	Hansard, 16 June 2026
19 June 2026	Planning Proposal Statement, Revision A, "Draft for comment"	Revision history
23 June 2026	Home Office responds to Natural England describing proposed pollution control and drainage measures	HO/NE correspondence
25 June 2026	**The Minister of State tells the House of Commons that three further sites are under consideration, "subject to feasibility assessments, planning permission and the necessary approvals"**	Ministerial statement
25 June 2026	**The application form is signed.** Planning Proposal Statement issued at Revision B, "Final draft"	Application form; revision history
25 June 2026	Article 5 Compliance Statement	Document date
26 June 2026	Air Quality Screening Technical Note, Issue 1, First Issue - **yet described in the covering letter of 6 July as "being finalised"**	Document control; covering letter
29 June 2026	Home Office follows up with Natural England; Natural England records a consultation of that date	HO/NE correspondence; Natural England letter, 23 July 2026
30 June 2026	**The Home Office publishes its site factsheet,** stating that the Site is subject to detailed feasibility assessments "which could take several months to complete", that these "do not predetermine its future use", and that no final decision has been taken - **five days after the application form was signed**	Home Office factsheet
30 June 2026	Planning Proposal Statement, Revision C, "Final for client review"	Revision history
3 July 2026	EIA screening direction requested - **three days before the application is submitted**	EIA Screening Direction Request
6 July 2026	**The application is submitted.** Two documents, the Noise and Air Quality Technical Notes, are "being finalised" and are not submitted. Planning Proposal Statement issued at Revision D, "Final for submission" - five revisions in thirty-two days	Covering letter; revision history
6 July 2026	Calum Miller MP tables parliamentary question UIN 16355	Hansard
9 July 2026	Written answer: the Ministry of Defence was first informed in November 2025	Hansard
9 July 2026	Natural England responds that its question is not yet answered, asking directly whether the application could result in surface water runoff entering the SSSI	HO/NE correspondence
13 July 2026	**The Minister of State informs the local Member of Parliament that the proposal "has been deemed Nationally Important and Urgent"** - seven days after submission. The letter cites section 293D and SI 2025/409, which are the standard route	Letter, 13 July 2026

Date	Event or document	Source
16 July 2026	The Home Office replies to Natural England that "it is not possible to confirm whether the surface water run-off from the site is Hydrologically linked", that there is "a strong likelihood it does", and that quantification can be undertaken "during the subsequent design stage"	HO/NE correspondence
20 July 2026	**Cherwell District Council is notified** of the national importance and urgency determination - fourteen days after submission, and seven days after the Member of Parliament	LPA notification
23 July 2026	**Natural England advises** that hydrological connection to the SSSI "cannot be ruled out"; records that greenfield runoff rates and a mains foul connection are anticipated; and requires re-consultation. The letter bears the reference **MOD008**	Natural England letter
19 August 2026	PPC submits Version 3.0 of this representation	-
26 August 2026	**The Secretary of State directs that the proposal is not EIA development** - fifty-one days after submission, and forty-four days after the determination of national importance and urgency	Screening direction
2 September 2026	The application documents are published and are received by PPC. This Version 4.0 follows	-

G.2 PPC draws attention to four intervals in particular:

Interval	Length
Article 4 notice served, to public announcement	**9 days** (notice first)
Application form signed, to publication of the factsheet stating that feasibility work "does not predetermine" the use	**5 days**
Application submitted, to determination of national importance and urgency	**7 days**
Determination of national importance and urgency, to the EIA screening direction	**44 days**

Appendix H: Schedule of Inconsistencies Within the Submitted Application

H.1 This appendix schedules every inconsistency PPC has identified within the material submitted by the Applicant. It is provided for a specific and limited purpose. PPC does not advance drafting defects as grounds of objection in themselves, and it does not suggest that any of these matters was intended to mislead. It advances them cumulatively, as bearing on two questions which are properly before the decision-maker: **what, precisely, the Secretary of State would be permitting**; and **what weight can safely be placed on the evidence submitted in support of it**.

H.2 The schedule is divided into three parts. Part 1 lists inconsistencies which are **material to what would be permitted**. Part 2 lists inconsistencies which are **material to the basis on which an assessment was carried out**. Part 3 lists **procedural, referencing and drafting** inconsistencies.

H.3 Where PPC has been unable to read a document as published, it says so, and does not assert an inconsistency it cannot verify.

H.4 Part 1: Inconsistencies material to what would be permitted

#	Matter	Position A	Position B
H1	**Site area**	10.22 hectares - application form Q20 and Planning Proposal Statement 2.1	"approximately 10.1ha" - Secretary of State's written statement. **9.36 hectares** - Utilities and Infrastructure Assessment section 1, describing the planning application red line boundary. **50.1 hectares** - Flood Risk Assessment 3.1.3. **50.5 hectares** - Preliminary UXO Risk Assessment 3.1. Five figures
H2	**Description of development**	Application form and covering letter: "the demolition of existing buildings and structures, the erection of new modular accommodation"	Planning Proposal Statement 1.5 and 3.1: "demolition of existing buildings and structures **and vegetation clearance**, the erection of new modular accommodation". A description of development defines what is permitted
H3	**Description of development, second variant**	Covering letter, application form and Planning Proposal Statement include "the retention and change of use of Building A6"	The Article 4 Notice of 16 June 2026 **omits** that element entirely, and omits "the provision of space for"
H4	**Duration of the use**	"a temporary period of 10 years" - Planning Proposal Statement 1.3, 1.6 and 3.1, and the description of development	"expanded for use as a **long-term** asylum accommodation solution" and "to secure **long-term** operation" - Statement on National Importance. "it is assumed that the Proposed Development operates **permanently** as a worst case scenario" and "There are no definitive plans for the decommissioning phase" - Secretary of State's written statement. "facilities

#	Matter	Position A	Position B
			are being designed to operate for longer in case use beyond ten years is required" - Transport Assessment 1.3.3
H5	**Design population**	1,256 service users - application form, covering letter, Planning Proposal Statement, Statement on National Importance	"c800 Service Users, with a further 450 bedspaces for surge capacity, totalling **1,250**" - Landscape and Visual Statement 1.2.3. "accommodation for **3,510** service users" - Preliminary UXO Risk Assessment 1.2 and 3.2
H6	**Which access serves which traffic**	"The southern access point operates as the principal point of entry to the site and is the **sole entrance in use**. The northern entrance has not been used for a considerable period" - Transport Assessment 3.2.6-3.2.7, with swept paths for refuse vehicles and coaches at the southern access	"Service and emergency vehicles will gain access to the development via the improved **northern** site access off the B4011" - Travel Plan 4.5.1. The capacity assessment output is labelled "Northern Site Access"
H7	**Cycle parking provision**	Eight bicycle storage spaces - Secretary of State's written statement	Seven cycle spaces, calculated at "one space per 20 staff members" - Transport Assessment 4.6.11
H8	**Vehicle parking**	147 spaces, being 139 standard and 8 accessible - Transport Assessment 4.6.5 and 4.6.8. 90 spaces in Phase 1 and 57 in Phase 2 - Secretary of State's written statement	Planning Proposal Statement 7.6 states the figure and **the figure is absent**: "the proposed development would provide [ ] for staff and visitors". The application form's vehicle parking table appears blank in the version published
H9	**Floorspace**	Planning Proposal Statement Table 2(b): new build 14,471 sqm, wastewater treatment plant 3,105 sqm, pumping station 359 sqm, **total 17,935 sqm**	The application form's floorspace table as published appears to give a total of **17,350**. PPC has been unable to reconstruct the form's table reliably from the version published and does not assert the discrepancy; it asks that the two figures be reconciled against the original

H.5 Part 2: Inconsistencies material to the basis of assessment

#	Matter	Position A	Position B
H10	**B4011 speed limit**	60 mph - Planning Proposal Statement 2.7 and 2.11	50 mph - Transport Assessment 3.3.1, and Secretary of State's written statement (twice). Recorded 85th percentile speeds at the northern access are 53.6 mph and 53.4 mph, which are above one limit and below the other
H11	**Natural England's position**	Planning Proposal Statement 8.2: Natural England "agree[d] with the conclusions... that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur"	Planning Proposal Statement 8.3, the immediately following paragraph: "Natural England has considered that the proposal **could have potential significant effects** on Arncott Bridge SSSI and has requested further information". The paragraphs concern different designations, but the document does not explain the distinction
H12	**The premises of Natural England's advice**	Natural England, 23 July 2026: "we note that the project will be designed to ensure **greenfield runoff rates**"; "it is anticipated that **foul water will be connected to mains**"	Drainage Design Statement, June 2026, 8.2: in Phase 1 "flows from this area **cannot be restricted to greenfield rates**"; 9.2: "Approach 3 was selected", being a new on-site works discharging to a watercourse. The drainage report predates the advice
H13	**Water efficiency standard**	110 litres per person per day - Policy ESD 3, recited at Planning Proposal Statement 5.49	140 litres per person per day - Drainage Design Statement 9.3, adopted as both the waste flow and the potable demand assumption
H14	**Population equivalent at Bicester Sewage Treatment Works**	"currently estimated to serve a resident Population Equivalent of approximately **40,436**"	"addressing a projected increase in Population Equivalent from approximately **49,500** to 67,840 at the 2026 design horizon". The two figures are given in consecutive bullet points and are not reconciled - Drainage Design Statement 4.2
H15	**Greenfield runoff rate and units**	"QBar **2.6/s/ha**" - Drainage Design Statement 8.2	"an QBar rate of **2.6l/s**" - 8.4. And "the **agreed** QBAR rate (or 2 l/s/ha whichever is greater)" - **7.1**, although no rate has been agreed with any authority
H16	**Accessible design**	"The detailed design of the development and its internal transport infrastructure **has been undertaken** in accordance with the requirements of the 2010 Equality Act" - Travel Plan 4.6.1	"The proposal for each site **is ongoing and is to be finalised at the detailed design stage**" - Planning Proposal Statement 3.15. The Equality Impact Assessment records that the Site and rooms "are not adapted for those with particular accessibility needs"
H17	**Unexploded ordnance risk**	"the overall risk is assessed as low" - Planning Proposal Statement 7.55	The assessment itself identifies four elevated risk factors and states that

#	Matter	Position A	Position B
			munitions storage "cannot be discounted at this stage, and **further research is warranted**". Its risk matrix is a figure and is not legible in the version published, so the rating cannot be verified
H18	**The scheme assessed for unexploded ordnance**	The application is for 1,256 service users on 10.22 hectares	The UXO assessment addresses "accommodation for 3,510 service users" on 50.5 hectares, and states that a detailed risk assessment is not possible because "a construction project has not yet been defined for this site"
H19	**The scheme assessed for flood risk**	The application is for a defined development on 10.22 hectares	The Flood Risk Assessment is written "to support the consideration of **future development**", assesses 50.1 hectares, and refers throughout to "any future development". It classifies the vulnerability of the **existing** use, not the use proposed
H20	**The scheme assessed for habitats screening**	The application as submitted	The Habitats Regulations Assessment "only considers the details of the Proposed Development that are described within the Site Feasibility Study… and the Scoping Report from the Home Office", neither of which has been submitted
H21	**Landscape baseline**	The Landscape and Visual Statement concludes that the development "would unlikely bring about any perceptible landscape and visual change **due to the existing buildings on the site**", the existing buildings being "much larger than the proposed modular units"	The application proposes to demolish 15,950 sqm of those buildings, retaining only Building A6 at 1,400 sqm - Planning Proposal Statement Table 2(a)
H22	**Planning history**	Planning Proposal Statement 2.14 to 2.22 records only 02/01045/GD (2003), 03/01824/GD (2004) and the undetermined reserved matters 04/02503/GD	The Secretary of State's written statement records a third-party representation based on "the Land Quality Assessment dated May 2010 to support a planning application (**11/01494/OUT**)". That application does not appear in the Applicant's planning history
H23	**Recent planning applications**	"There have been **no recent (five years) relevant planning applications** within the application area" - Transport Assessment 1.5.1	The Secretary of State's written statement refers to application 11/01494/OUT and its 2010 Land Quality Assessment. PPC does not assert that these are inconsistent, since the periods differ, but asks that the planning history be stated completely in one place

#	Matter	Position A	Position B
H24	**Deprivation ranking**	"The Ward area is more deprived than 71% of neighbourhoods in England"	"ranked in the second most deprived percentile". Both appear in the Secretary of State's written statement in respect of the same ward and are not obviously reconcilable
H25	**Screening timescale**	The Applicant's screening request asks for an opinion "within the statutory three-week period"	The direction was issued approximately eight weeks later, on 26 August 2026
H26	**Air Quality Technical Note**	Dated 26 June 2026 and marked "Issue 1, First Issue"	Described in the covering letter of 6 July 2026 as one of two documents "being finalised and will be submitted under separate cover"

H.6 Part 3: Procedural, referencing and drafting inconsistencies

#	Matter	Position A	Position B
H27	**Governing statutory instrument**	The Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025 - application form, Article 4 Notice, LPA notification, Planning Proposal Statement	The Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025, which is SI 2025/409 and governs the **standard** route - the body of the Article 5 Compliance Statement, and the Minister of State's letter of 13 July 2026
H28	**Statutory sections relied upon**	Sections 293B to 293C - Planning Proposal Statement 1.2. Sections 293B to 293E - covering letter	"Section 293D Applications" - Minister of State's letter of 13 July 2026. Section 293D is the standard Crown Development route
H29	**To whom the application was made**	To the Secretary of State, via the Crown Casework Team at the Ministry of Housing, Communities and Local Government - covering letter	"An application has been made **to the Planning Inspectorate**" - Minister of State's letter of 13 July 2026
H30	**The article relied upon for the statement of national importance**	Article 6(1)(c)(iv) of SI 2025/411	The Statement on National Importance cites "article 6(1)(iv)", which is not a provision of that Order
H31	**The title of the statement**	"Statement of National Importance and **Emergency**" - covering letter and Planning Proposal Statement 1.8	"Bicester: Statement on National Importance" - the document itself
H32	**Document titles in the application content list**	"Transport Statement"; "Landscape and Visual Assessment"	The documents submitted are a "Transport Assessment" and a "Landscape and Visual **Statement**". The second distinction is material: see 12.5.2
H33	**Natural England file reference**	"Your Ref: MOD015" - letter of 4 June 2026	"Your Ref: **MOD008**" - letter of 23 July 2026. MOD008 is a different site within the same programme
H34	**Heritage walkover date**	"on February 23rd 2026" - Archaeological and Heritage Assessment 4.1	"on **March 11th 2026**" - the same document, section 9
H35	**The archaeological consultee**	"a Written Scheme of Investigation agreed in advance with the Oxfordshire County Council Archaeologist"	"agreed in advance with the **Oxfordshire Historic Environment Officer**" - the same document, section 11.2, in a paragraph which is also duplicated verbatim
H36	**The road number**	B4011 - throughout the application	"the B**4001**" - Preliminary Geo-environmental and Geotechnical Assessment 1.3. "B**1104**" - Transport Assessment Appendix B and Table 3-1
H37	**The lane name**	Widnell Lane - throughout the application	"Widnall Lane" - Preliminary UXO Risk Assessment 3.1
H38	**Search addresses used for the**	The Site postcode is given as OX25 1AE - Flood Risk Assessment 1.1.1	The Thames Water searches were run against "Wild Meadow, Blackthorn, Bicester, **OX25 1TW**" and "Bicester OX25

#	Matter	Position A	Position B
	Thames Water asset searches		1TW". The National Grid enquiry gives "**OX25 1PS**"
H39	**The sewerage undertaker**	Thames Water, named throughout the Drainage Design Statement	The Flood Risk Assessment refers twice, at 5.3.1 and 5.4.1, to "**[the relevant service provider]**", the placeholder unresolved in a submitted document
H40	**Internal cross-reference, Flood Risk Assessment**	Paragraph 1.3.1 refers the reader to "Section 1.3 above" for the scope of the report	Section 1.3 **is** the limitations section; the scope is at section 1.2
H41	**Internal cross-reference, Planning Proposal Statement**	Paragraph 7.56 states that the Security Management Plan "is summarised at paragraph **7.52 below**"	Paragraph 7.52 precedes 7.56 and concerns policy compliance and viability. Paragraphs 7.57 to 7.61 contain no text
H42	**Table of contents, Planning Proposal Statement**	The document is marked Revision D, "Final for submission"	Its table of contents contains the entry "Context and Background ..... **Error! Bookmark not defined.**"
H43	**Missing paragraphs, Planning Proposal Statement**	The document is marked "Final for submission"	At least twenty numbered paragraphs carry a heading but no text, including 4.34 to 4.38, 4.41, 4.46 to 4.53, 6.6 to 6.8, 7.3, 7.57 to 7.61 and 7.72 to 7.73. Paragraph 4.23 lists the recreational facilities to be provided and the list is a single empty bullet
H44	**Missing figures, Planning Proposal Statement**	-	Paragraph 7.6 (parking provision), 7.7 (cycle parking standard) and 7.10 (percentage traffic increase on the B4011) each state that a figure follows and the figure is absent. Paragraph 7.2 opens with a full stop
H45	**Document assembly**	Utilities and Infrastructure Assessment, Appendix G	The final page carries the footer "Operation Nettlefire / MOD015 - **Drainage Design Statement** / June 2026 45". A page from a different report appears to have been bound into it
H46	**Project naming**	"MOD015"	The submitted documents variously use "Nettlefire", "Operation Nettlefire", "Project Nettlefire", "GPA_HO_ProgrammeX", "Bicester A Site", "Site A, Bicester", "MOD 015" and "Site 015". PPC records this only because it makes cross-referencing between documents unnecessarily difficult for consultees
H47	**Commissioning body**	The Home Office is the client for every technical report	The Preliminary UXO Risk Assessment was "commissioned by the Government Property Agency"

#	Matter	Position A	Position B
H48	**Habitats Regulations Assessment date**	Commissioned by the Home Office on 26 February 2026; the report itself carries no date	Referred to by Natural England as the "Bicester HRA Report **10 April 2026**"
H49	**Article 5 compliance**	The Article 5 Compliance Statement asserts that "notice… has been duly served on all persons required to be notified" and that "The requirements of Article 5 have been satisfied in full"	It identifies no person notified, no date of service and no certificate of service, and its operative text cites the wrong statutory instrument
H50	**Authorship**	NPPF paragraph 190 requires site investigation information to be prepared by a competent person	No named author, checker or approver appears on any of the technical reports. Initials or role titles only are given, and in several the fields are blank

H.7 PPC invites the Secretary of State to draw the following conclusion, and no more than the following conclusion. The submitted material contains fifty identified inconsistencies, of which nine bear directly on what would be permitted and seventeen bear on the basis on which an assessment was carried out. Several of them, in particular items H1, H2, H4, H5, H18, H19 and H20, mean that different documents within the same application assess different developments on different areas of land for different populations and for different durations. Taken with the chronology at Appendix G and with the technical shortfalls identified throughout Part C, PPC submits that this is not an evidence base on which an informed planning judgement can be made, and that the appropriate response is the one Planning Practice Guidance Paragraph 057 provides.

Appendices I to M: Consultation Schedule and Supporting Technical Appendices

I.1 This representation is accompanied by a separate bundle of appendices, provided as a single supporting document and to be read with, and as part of, this representation. The bundle comprises: Appendix I, the Schedule of Individual Objections from the parish consultation of 7 to 14 September 2026; Appendix J, PPC's comparative evidence review of alternative accommodation options; Appendix K, PPC's technical note on land contamination; Appendix L, PPC's technical note on on-site electricity generation; and Appendix M, PPC's technical note on the foul drainage fallback.

I.2 As to Appendix I, PPC appends the 82 individual representations as evidence of the nature and extent of local opposition to the proposal. Each representation is reproduced as submitted, in the words of its author, so that the Secretary of State has before them the authentic local record. PPC does not adopt any individual representation as its own case; its own case is set out in the body of this representation. PPC advances the Schedule to demonstrate that the concerns developed in the grounds of its objection are shared, in specific and locally grounded terms, across the affected community.

I.3 The recurring themes across the representations, each developed in the grounds above, are: the unsuitability of the location and the inadequacy of its highway and pedestrian access; the capacity of local infrastructure, healthcare and emergency services; the scale of the proposal relative to the receiving settlements; the adequacy of the environmental, ecological and flood-risk evidence; and the welfare both of the existing community and of the future occupants of the Site.

Schedule of Individual Objections

Home Office Planning Application PCU/RARE/C3105/3378843

Proposed asylum accommodation for up to 1,256 men, Site A, MOD Bicester, Oxfordshire

This schedule compiles individual public representations submitted in objection to the above application, for appendix to Piddington Parish Council's formal objection. The representations are reproduced in full and verbatim from the originals received, and are set out below in address order (by street, then house number, then surname). Where the same person submitted more than one representation, the submissions have been consolidated to a single, fullest entry. Nothing in the wording of any individual representation has been altered, summarised or corrected.

Total individual representations included: 82

Index

1. [redacted] — [redacted], Piddington, [redacted]
2. [redacted] (Mrs [redacted]) — [redacted], Piddington, [redacted]
3. [redacted] — Resident of Brill, Buckinghamshire, [redacted]
4. [redacted] — [redacted], Ludgershall, Buckinghamshire, [redacted]
5. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]
6. [redacted] — [redacted], Piddington, Oxfordshire, [redacted]
7. [redacted] — [redacted], Piddington, Oxfordshire, [redacted]
8. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]
9. [redacted] — [redacted], Piddington, Oxfordshire, [redacted]
10. [redacted] — [redacted], Piddington, Bicester, [redacted]
11. [redacted] — [redacted], Piddington, [redacted]
12. [redacted] — [redacted], Piddington, [redacted]
13. [redacted] — [redacted], Piddington
14. [redacted] — [redacted], Piddington, [redacted]
15. [redacted] — [redacted], Piddington, Bicester, [redacted]
16. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]
17. [redacted] — [redacted], Piddington, [redacted]
18. [redacted] — [redacted], Piddington, [redacted]
19. [redacted] (Mrs) — [redacted], Piddington, [redacted]
20. [redacted] — [redacted], Piddington, Oxfordshire, [redacted]
21. [redacted] — [redacted], Piddington, Oxfordshire, [redacted]
22. [redacted] — [redacted], Piddington, Bicester, Oxon, [redacted]
23. [redacted] — [redacted], Piddington, Bicester, [redacted]
24. [redacted] — [redacted], Piddington, Bicester, [redacted]
25. [redacted] — [redacted], Piddington, Oxfordshire, [redacted]
26. [redacted] (Mrs) — [redacted], Piddington, Oxfordshire, [redacted]
27. [redacted] — [redacted], Piddington, Bicester, [redacted]
28. [redacted] — [redacted], Piddington, Bicester, Oxfordshire, [redacted]
29. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]
30. [redacted] — [redacted], Piddington, Bicester, Oxfordshire, [redacted]
31. [redacted] (Mrs) — [redacted], [redacted], Piddington, [redacted]

32. [redacted] — [redacted], Piddington, [redacted]
33. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]
34. [redacted] — [redacted], Piddington, Bicester, [redacted]
35. [redacted] — [redacted], Piddington, [redacted]
36. [redacted] — [redacted], Piddington, [redacted]
37. [redacted] — [redacted], Piddington, [redacted]
38. [redacted] — [redacted], Piddington, [redacted]
39. [redacted] — [redacted], Piddington, [redacted]
40. [redacted] — [redacted], Piddington, [redacted]
41. [redacted] — [redacted], Piddington, Bicester, [redacted]
42. [redacted] — [redacted], Piddington, [redacted]
43. [redacted], CEng MICE — [redacted], Piddington, [redacted]
44. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]
45. [redacted] (Dr) — [redacted], Piddington, [redacted]
46. [redacted] — [redacted], Piddington, [redacted]
47. [redacted] — [redacted], Piddington, Oxfordshire, [redacted]
48. [redacted] — [redacted], Piddington, [redacted]
49. [redacted] — [redacted], [redacted], [redacted], Piddington, [redacted]
50. [redacted] — [redacted], Piddington, [redacted]
51. [redacted] — [redacted], Piddington, [redacted]
52. [redacted] — Piddington, Oxfordshire (address incomplete in submission)
53. [redacted] — Piddington, Oxfordshire (address not stated in submission)
54. [redacted] — [redacted], Piddington, Bicester, [redacted]
55. [redacted] — [redacted], [redacted], Blackthorn, [redacted]
56. [redacted] — [redacted], [redacted], Piddington, [redacted]
57. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]
58. [redacted] — [redacted], [redacted], Piddington, Bicester, Oxon, [redacted]
59. [redacted] — [redacted], [redacted], Piddington, Bicester, Oxon, [redacted]
60. [redacted] — [redacted], Piddington, Oxfordshire, [redacted]
61. [redacted] — [redacted], Piddington, Bicester, [redacted]
62. [redacted] — [redacted], Piddington, Bicester, [redacted]
63. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]
64. [redacted] — [redacted], Piddington, Bicester, [redacted]
65. [redacted] — [redacted], Piddington, [redacted]
66. [redacted] — [redacted], Piddington, [redacted]
67. [redacted] — [redacted], [redacted], [redacted]
68. [redacted] — [redacted], Piddington, [redacted]
69. [redacted] — [redacted], Piddington
70. [redacted] — [redacted], Piddington, [redacted]
71. [redacted] — [redacted], Piddington, Bicester, [redacted]
72. [redacted] — [redacted], Piddington, [redacted]
73. [redacted] (Mrs) — [redacted], Piddington, Oxon, [redacted]
74. [redacted] (Miss) — [redacted], Piddington, Oxon, [redacted]
75. [redacted] — [redacted], Piddington, nr. Bicester, [redacted]

76. [redacted] — [redacted], [redacted], Oakley, [redacted]

77. [redacted] — [redacted], [redacted], Piddington, Oxfordshire, [redacted]

78. [redacted] — [redacted], [redacted], Piddington, [redacted]

79. [redacted] — [redacted], [redacted], Piddington, [redacted]

80. [redacted] — [redacted], Piddington, Bicester, [redacted]

81. [redacted] — [redacted], [redacted], Piddington, Bicester, [redacted]

82. Resident of [redacted] (name not stated in submission) — [redacted], [redacted]

1. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 9 September 2026

Application Reference: PCU/RARE/C3105/3378843

Crown Development Casework Unit

Cherwell District Council Planning Service

Piddington Parish Council

Provision of electrical power

Sirs,

I write to object to the above application mainly on the disruption which would be caused by the generation of electricity for this site.

Starting with the delivery and storage of fuel (diesel) for the generators. Using readily available manufacturers consumption figures, to provide sufficient power to the site, some 20,000 (twenty thousand) litres of diesel (independent engineering estimate) would be required every 24 hours. This would require a 40,000 litre tanker delivery every two days. The cost, at £1.20/litre equates to £24,000 per DAY, £730,000 per MONTH, £8.76 Million per YEAR. This is fuel alone and does not take into account the delivery of said fuel, the purchase and maintenance of such generating plant. The same amount of power from the National Grid, non-domestic, would be £6.6 Million, so fuel alone would be around £2.1 million more per annum.

I can see no information on fuel storage on site. The question arises about the provision of emergency spillage containment, details of bunding, to prevent any spillage reaching and contaminating natural water courses and the consequent potential ecological damage. Perhaps more importantly there is a fire risk, as with any bulk storage of flammable liquid. The contents page of the Fire Safety Strategy document covering a facility housing this number of people, RIBA Stage 2, lists Travel Distances, Minium Number of Exits, Evacuation Strategy, Fire Vehicle Access and Water Supplies. In the Application Document as published those sections contain no comment. No occupancy figures, no travel distances, no numbers of exits, no firefighting water supply or hydrants. No mention of the nearest Fire Station or Response Times. Oxfordshire Fire and Rescue Services have not been consulted it would seem. The statements in the document generally state 'more information is needed'.

Large electricity generators such as would be needed here, as well as generating electrical power also produce noise and have an impact on air quality. The document states 'consideration may need to be given to noise insulation'. No area quantified, no units counted, no mitigation committed.

Air quality and pollution. Using the Government's 2026 greenhouse gas conversion factors, combustion at that level would produce roughly 18,900 tonnes of CO2e per year.

The equivalent electricity from the UK grid would produce roughly 3,600 tonnes.

That is more than FIVE TIMES the carbon emissions.

Then there is the local air quality impact.

NOx., Particulates, Generator exhaust emissions. Potentially millions of litres of diesel being burned every year causing regular fuel tanker movements, additional HGVs and daily traffic.

Yet the dedicated Air Quality Screening Technical Note identifies road traffic as the principal operational emissions source and does not quantify emissions from the generators. The dedicated Noise Impact Assessment does not quantify operational generator noise either.

For a development that may require large scale diesel generation potentially operating around the clock, surely this should be properly assessed BEFORE approval?

There is also the effect on the local ecology to be considered. Buildings on the site are known to be the habitat of colonies of bats, some species of which are very rare. The 24/7 noise of the generators and the lighting would probably be more than enough to destroy these colonies, and that, I understand, is a criminal offence. Likewise there would be a significant impact on the bird life in that area.

Mr [redacted]

[redacted]

Piddington [redacted]

09/09/2026

2. [redacted] (Mrs [redacted])

Address: [redacted], Piddington, [redacted]
Date: 7 September 2026

Dear Crown Casework Team,

I am writing to formally object to the proposed development at Site A under reference PCU/RARE/C3105/3378843.

My objection is based on material planning considerations relating specifically to the suitability of this site, the scale of the proposed development, highway and pedestrian safety, drainage and utilities, ecology, infrastructure and the amount of important information that appears still to be unresolved.

I am particularly concerned that approval is being sought for a development accommodating up to 1,256 people for a period of ten years, while significant matters appear either undetermined or dependent upon future investigation.

Highways and pedestrian safety

The site is in a rural location with no adequate pedestrian infrastructure serving it. The submitted documents themselves appear to acknowledge that walking to nearby bus stops would not be a realistic option.

I am therefore extremely concerned about the safety of people who may nevertheless leave the site on foot.

Measures such as shuttle buses and providing high-visibility clothing do not, in my view, adequately address the underlying highway safety problem.

If the proposed off-site works provide no new continuous footway, suitable pedestrian crossings or lighting, I do not believe it has been demonstrated that the development can operate safely for pedestrians or other road users.

For a development of this size and duration, safe access should be an integral part of the proposal rather than something dependent upon people choosing not to walk.

Drainage and flooding

I am concerned that important details relating to drainage infrastructure remain unresolved, including the precise location of some infrastructure.

For a development accommodating more than a thousand people, the planning authority and Secretary of State should have clear evidence that foul and surface-water drainage arrangements are deliverable, appropriately located and capable of operating safely before permission is granted.

These matters could have consequences beyond the boundary of the site, including for neighbouring land and surrounding communities.

Utilities and infrastructure capacity

The submitted information appears to indicate that existing utility capacity is still to be determined.

That is a fundamental issue.

A development of this scale will create substantial demand for water, electricity, sewage treatment and other essential services. I do not believe such significant questions should simply be left to be resolved after planning approval.

There should be clear evidence that the necessary capacity exists, or that appropriate upgrades are deliverable, before a decision is made.

Ecology and biodiversity

I am also concerned that ecological work remains outstanding, including surveys relating to protected or important species such as bats, breeding birds, reptiles, dormice and great crested newts.

The purpose of ecological surveys is to establish what species and habitats are present so that the impact of a development can be properly understood.

If these surveys are incomplete, I question how the full ecological consequences of the proposal can currently be assessed or how appropriate mitigation can confidently be determined.

This is particularly important given the rural setting and the scale and proposed duration of the development.

Scale and location

The proposal is not a small or short-term use. Accommodation for up to 1,256 people for ten years represents a substantial development.

The suitability of the location therefore needs to be assessed against the infrastructure actually available around the site.

The absence of pedestrian infrastructure, dependence on shuttle transport, unresolved utility questions and incomplete environmental information all raise concerns about whether this rural location is capable of safely and sustainably supporting development at this scale.

Insufficient information at the point of determination

My overriding concern is that too many fundamental matters appear to remain unanswered.

I appreciate that planning permissions routinely contain conditions dealing with detailed matters. However, there is an important distinction between matters of detail and fundamental questions affecting whether a development is safe, sustainable and acceptable in principle.

In my view, questions concerning safe pedestrian access, utility capacity, drainage and ecological impact go directly to the suitability of the site.

I therefore respectfully ask the Secretary of State to consider whether sufficient evidence has actually been provided to make a properly informed decision.

Given the scale of the proposal, its ten-year duration and its potential consequences for the surrounding area, I do not believe permission should be granted while such significant matters remain unresolved.

I therefore ask that the application be refused, or at the very least not determined positively until the outstanding evidence and surveys have been completed and their implications fully assessed.

I would be grateful if this email could be recorded as my formal representation in relation to:

Reference: PCU/RARE/C3105/3378843

Yours faithfully,

Mrs [redacted]

[redacted]

Piddington

Ox251ps

3. [redacted]

Address: Resident of Brill, Buckinghamshire, [redacted]
Date: 14 September 2026

Dear Sir/Madam,

I am writing to formally object to the proposed development at Site A, MOD Bicester, application reference PCU/RARE/C3105/3378843.

My main concern is the suitability of this location for a development of this size, particularly given that up to 1,256 people are proposed to be accommodated here.

I am particularly concerned about the impact this could have on Piddington and the surrounding villages. Piddington is a very small village and has very limited facilities, with no shop and very little within easy walking distance of the proposed site. The site itself is also quite isolated and is not well connected to the services and amenities that people would reasonably need on a day-to-day basis.

I worry about what this would mean in practice for both the people being accommodated there and the existing local communities. With such a large number of people living in an isolated location, there will inevitably be a need for people to travel into Piddington, the surrounding villages and further afield to access shops, services, activities and other facilities. There does not appear to be sufficient local infrastructure or public transport to support this.

I am also concerned about the additional pressure this could place on the surrounding villages, which are small communities themselves and do not have the facilities or infrastructure of a town. This is not simply about the number of people being accommodated on the site, but whether the location is appropriate for such a large-scale development in the first place.

I am also concerned about highway and pedestrian safety. The surrounding roads are rural and, in places, have very limited pedestrian facilities. Increasing the number of people needing to travel between the site and neighbouring communities could create additional pressure and safety concerns.

I also have concerns about whether water, sewage, drainage and other infrastructure has been properly established for a development of this scale. From the information available, it appears that a number of important matters remain unresolved.

I completely understand that suitable accommodation needs to be provided, and my objection is not directed towards the people who may be accommodated at the site. My concern is that this particular location appears isolated and poorly served by local facilities, and I do not believe the impact on Piddington and the surrounding communities has been adequately addressed.

I therefore respectfully ask that the application is refused, or that no decision is made until the concerns around the suitability of the location, access to services, highways, pedestrian safety and local infrastructure have been properly assessed.

I would be grateful if you could confirm receipt of my objection.

Kindest regards,

[redacted]

Resident of Brill, Bucks [redacted]

14th September 2026

4. [redacted]

Address: [redacted], Ludgershall, Buckinghamshire, [redacted]
Date: not stated

PCU/RARE/C3105/3378843

I am writing to add my voice to the residents of Piddington and the surrounding villages, who are wholly against and utterly disgusted at the Home Office/Government's decision to house upwards of 3K illegal immigrants at Site A MoD Bicester.

Many have cited the suitability/location of this site as the main reasons for objection, and I wholeheartedly agree with these sentiments, outlined below:

1. Road and Pedestrian Safety – lack of pavements coupled with vehicles travelling at speed along Widnell Lane. Given the inhabitants will be free to come and go as they please, bar signing in and out via a register, and be trusted to return, it is an accident waiting to happen. A man who lives in my village was knocked down along a dark lane with no pavement when he was a teenager and he has suffered those consequences since.

2. Water, Sewage, Drainage, Disease– sufficient capacity for accommodating the number of inhabitants has yet to be proven/installed across all these areas. This is a huge potential environmental health risk along with any potential diseases being brought into our country by unvetted, undocumented men.

3. Electricity and Utilities – generator provision is proposed as the existing electrical setup has not yet been verified. Will this be adequate and what happens in the event of a generator breakdown?

4. Flood Risk – surface water flooding is a real concern – flooding happens locally on a regular basis following rainfall due to poorly maintained and antiquated drainage systems. Thames Water are ineffectual at the best of times!

5. Ecology and Diversity – protected species exist on the site (bats and newts have been sited) alongside a wide range of British wildlife that will be lost to this development. Despite being tragic and inhumane, where are the surveys to show the impact of what we will lose and never regain.

6. Noise and Air Quality – generators, traffic, plant and other operational risks associated with a development of this scale, not to mention the noise that will be generated from the residents themselves has not been sufficiently assessed and will directly affect the residents of Piddington on a daily basis as has been proven at Wethersfield. For clarification, Piddington residents have visited Wethersfield to see for themselves. This is not hearsay.

7. Scale and Location – is accommodation for upwards of 3k men appropriate and sustainable in this rural location with limited walking and public transport infrastructure.

8. Contamination – asbestos is present and unexploded ordnance could be. There are other immigrants housed in Ambroseden that have been seen defecating along pavements when they have housing provided. Are we just accepting this behavior now? My Uncle died of asbestos poisoning from years of working on sites with poor Health and Safety measures. When the

asbestos is removed from this site, will there be adequate protection for the closest surrounding houses and dwellings from the airborne particles?

9. Local infrastructure – can the wider impact on roads, emergency services, and surrounding communities been adequately assessed. The last time I had to call an ambulance to my village it took 3 hours to arrive! God forbid a fire, of which has happened in our village recently.

Given all the above, there seems to be great swathes of missing, incomplete or disingenuous information surrounding this, and frankly it stinks! The 'urgent Crown Process' means nothing if this is rushed through to expediate the opening of a substantial development proposed for a 10-year period whilst these matters remain ignored.

Personal Statement

I live in a neighboring village 2.5 miles from the site, and I run the only pub there with my brother.

My brother lives on site for insurance and security purposes.

My house is just up the road.

We often work shifts alone, including evening shifts to save money, and I regularly lock up and walk home by myself. This is something I will have to re-consider doing and I will also have to make alternative arrangements for (particularly) female staff members.

With upwards of 3K migrants living 2.5 miles away, our business will be less desirable to the general public, making it even harder to eke out a living in hospitality post Covid, but attractive to migrants who may see us as an easy target for alcohol.

We will have no choice but to spend money we don't have, on extra security and CCTV. This is an unacceptable infringement of our human rights, and I am beyond angry that this Government is doing nothing to help the British people navigate this continued invasion.

There is also a children's play area opposite my pub, and local children congregate there regularly to play and meet their friends, often walking home at dusk, in time for dinner. Their parents are fast beginning to realize they will have to curtail this as in the past, kids have been safe to walk home alone. Not anymore.

As a village, we are being forced to create and adopt a village safety plan which is heart-breaking for our older residents who made our village what it is today, but we cannot leave anything to chance as you are putting our lives at risk.

To quote just one casualty of illegal immigration, and there have tragically been so many more...

I thought of Rhiannon Whyte as I was walking home from one of the village safety meetings the other night. There are pockets of our village where there are no houses, we have no streetlights and plenty of copses and fields surrounding us. Should any one of us have been dragged off into one of those fields, and ended up like Rhiannon Whyte, who in Government will be held responsible for placing us in clear and present danger, with no thought to our safety and the words 'everyone must play their part' ringing in our ears?

WRONG PLAN, WRONG SITE

[redacted]

[redacted]

Ludgershall

Buckinghamshire

[redacted]

5. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]
Date: 13 September 2026

REF Application PCU/RARE/C3105/3378843 (26/01833/CROWN)

I strongly OPPOSE the above application regarding the change of use at MOD Bicester Site A for the following reasons:-

- The demolition of the existing buildings will release toxic asbestos into the surrounding areas and especially over the neighbouring village of Piddington. There are no plans to monitor and mitigate for any asbestos release affecting both demolition and construction workers, and residual particles in the surronding environment.

- The demolition then construction of so many new accomodation blocks will create unacceptable levels of construction noise across the rural village of Piddington.

- The associated increase in traffic and HGV's in and out of the site onto the Thame Road (during both construction and everyday use) will increase potential traffic collisions on this busy rural road.

- The proposed waste water treatment plant is sited in the low lying area which is prone to flooding and risks serious effluent escape into the local water courses, including the adjacent BBOWT Ray Meadows nature reserve.

- The proposed outdoor recreational areas for such a high number of "service users" will create unacceptable high noise levels in the environment, and severely negatively impact the adjacent current residents in both the village of Piddington and Widnell Lane Travellers Site.

- The electric service in the vicinity is very unreliable EG several power cuts in Piddington in last month, the high increased electrical usage of the large site will put unmanageable loading on the local supply leading to frequent power cuts in Piddington village.

- Night time illumination on the site, including new lamp posts etc, will be clearly visible from most houses in Piddington as Piddington is a linear village which is aligned to the MOD Site A boundary. This light pollution in such a rural area will be intrusive 24/7 and is unacceptable.

- Accomodating the proposed high number of "service users" will create exceptionally high levels of noise in such a quiet rural area which will severely impact the right to a quiet enjoyment of properties and gardens across Piddington. This noise will be 24/7 which is unacceptable.

- The size of the proposed site will severely negatively impact an area which is wildlife sensitive with (1) Piddington Jubilee Reserve, (2) a BBOWT Ray Valley reserve Meadow Farm, and (3) the SSSI at Arncott in the vicinity.

- The height of the proposed new buildings means they will be visible from the Thame Road, from Bicester Garrison Football Pitch, from Piddington Recreation Ground, and from houses on the western edge of Piddington village.

- Because the "service users" will be "un-detained", they will be at liberty in a small rural environment. The proposed number of asylum seekers is out of proportion to current residents in the area, out-numbering current residents by 300-400%.

- There is no provision for security in the surrounding villages of Piddington, Arncott, Blackthorn to keep residents safe from such an immediate influx of asylum seekers. This security would need to be 24/7 because they are not detained on site.

- Moreover, the site is not suitable for foreign "service users" who have no knowledge of such a quiet rural landscape. There are NO facilities in surrounding villages. There are NO pavements on surrounding rural roads or safe walking routes along the Thame Road for anyone. The Thame Road is unrestricted with fast vehicles on this main travel route between the towns of Bicester and Thame. There are NO bus stops on the Thame Road.

[redacted]

[redacted], [redacted], Piddington, Oxfordshire [redacted]

[redacted]

13 September 2026

6. [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 13th September 2026

FORMAL OBJECTION – MOD BICESTER SITE A

Application Reference: PCU/RARE/C3105/3378843

Name: [redacted]

Address: [redacted]

Piddington

Oxfordshire

[redacted]

Date: 13th September 2026

Dear Crown Development Casework Unit,

I am writing as a resident of Piddington to object to the proposed development at MOD Bicester Site A.

I live beside this site, use the surrounding roads regularly and know the local area. I have also spent a considerable amount of time reading through the documents submitted with this application.

The more I have read, the more concerned I have become.

My concern is not about the principle of providing alternative accommodation for people currently living in asylum hotels. I understand the pressure on Government to find suitable alternatives. My concern is much simpler: is this particular site actually ready and suitable to safely accommodate up to 1,256 people?

Having read the Utilities and Infrastructure Assessment, Drainage Design Statement, Travel Plan, Air Quality Screening Technical Note, Habitats Regulations Assessment, ecological correspondence and Noise Impact Assessment, I do not believe that question has yet been satisfactorily answered.

There seem to be too many fundamental matters where the applicant's own documents say further surveys, modelling, investigation or agreement are still required.

Drainage and sewage

This is probably one of my biggest concerns.

The Drainage Design Statement describes the drainage proposals as being at concept stage and says further work is required to confirm their technical feasibility.

Further CCTV surveys, topographical work, ground investigations, utility surveys and confirmation of suitable outfalls and receiving watercourses are still required.

For a development intended to accommodate 1,256 people, I find it difficult to understand why these fundamental questions are still unanswered at the point at which planning permission is being considered.

The position regarding sewage concerns me even more.

The applicant's own documents state that the viability of the current foul-water proposals has

not yet been determined. Capacity at the nearest wastewater treatment works has not been confirmed and tankering is not considered viable for the full population.
The alternative appears to be an on-site wastewater treatment works, but again there is no confirmed final discharge location, there appear to be no suitable watercourses for discharge within the site itself, and third-party land may potentially be required.
Before 1,256 people are allowed to live on this site, surely we should know where their sewage is going to go and have confidence that the solution is actually achievable?
Flooding and surface water
Those of us who live locally are naturally concerned about flooding and drainage.
What concerns me is that the applicant's own investigations have identified localised flooding and ponding, including during dry conditions, blocked drainage infrastructure and areas where flooding is already reported.
At the same time, the final surface-water outfalls and downstream receiving systems have still not been confirmed.
The proposed calculations therefore appear to assume that a suitable outfall will ultimately be found.
That seems the wrong way around to me.
Surely the applicant should demonstrate that the water has somewhere suitable and safe to go before planning permission is granted, rather than obtaining permission first and finding the solution afterwards?
Wildlife and Arncott Bridge Meadows SSSI
The ecological implications particularly worry me because we live in a rural area and the effects of this development will not necessarily stop at the site boundary.
The later correspondence regarding Arncott Bridge Meadows SSSI is particularly concerning.
Natural England specifically asked whether runoff from the development could affect the SSSI through changes to its hydrology, erosion, water depths or longer periods of flooding.
The applicant's response appears to accept that it cannot currently confirm the hydrological connection, but considers there is a strong likelihood of one and that it is reasonable to assume surface water from the development could enter the SSSI.
Yet the actual impact is apparently going to be established through detailed hydraulic modelling at a later stage, once the drainage strategy has been finalised.
I find this difficult to understand.
If there is a strong likelihood that water from this development could reach a protected SSSI, shouldn't we understand what effect that water could have on the SSSI before deciding whether the development is acceptable?
There is also the possibility of an on-site wastewater treatment works discharging treated effluent into a watercourse which has not yet even been identified.
Before permission is granted, I would like reassurance from both the Council and Natural England that the final drainage and wastewater arrangements will not damage the SSSI, local

watercourses, habitats or wildlife.

Transport and our local roads

As someone who uses these roads, the transport proposals also concern me.

The applicant's own Travel Plan acknowledges that the site is not ideally located for sustainable travel and that pedestrian infrastructure around parts of the site is inadequate.

What particularly concerns me is that the Travel Plan mainly considers staff and visitors rather than the 1,256 people who will be living there.

The proposals appear to rely heavily on shuttle buses and minibuses, but I cannot see sufficient certainty about how frequently these will operate, their capacity, hours of operation or how the service will work over the lifetime of the development.

There will also be staff vehicles, visitors, coaches, deliveries, refuse vehicles, HGVs and potentially wastewater tankers.

These are rural roads used every day by the people who live here.

I would therefore like to see a much clearer picture of the total additional traffic generated by this development, rather than individual elements being considered separately.

Air quality

The Air Quality Screening Technical Note concludes that detailed operational modelling is unnecessary because predicted traffic is expected to remain below the relevant thresholds.

That conclusion may be perfectly reasonable if all the traffic has been included.

But given the uncertainty elsewhere in the application, I would like confirmation that the calculations include Service User shuttle buses, coaches, staff and visitor vehicles, deliveries, refuse collection, HGVs and any wastewater tanker movements that may become necessary.

If those movements have not all been included, then I believe the air-quality assessment should be reconsidered.

Noise for people already living here

The Noise Impact Assessment is another document that left me with an important unanswered question.

It appears mainly to consider how existing road noise from the [redacted] will affect people living on the proposed site.

But what about the people who already live here?

I cannot find a comprehensive assessment showing what noise generated by this development will mean for existing homes in Piddington, Arncott and the surrounding countryside.

Potential noise sources include generators, wastewater treatment equipment, pumps, HGVs and deliveries, refuse vehicles, coaches, shuttle buses, car parks and construction and demolition activity.

Some of this equipment may potentially operate at night.

With a development of this size, I think existing residents deserve to know what the predicted noise levels will be at their homes before permission is granted.

It is the combination of unanswered questions that concerns me most

Any one of these issues on its own might be capable of being resolved.
What worries me is how many fundamental issues remain unresolved at the same time.
They are also connected.
If there is insufficient electrical capacity, more reliance may be placed on generators, creating additional noise and emissions.
If the existing sewerage system cannot accommodate the development, an on-site treatment works or tankering may be required, creating additional traffic, noise and potential environmental effects.
If the eventual surface-water outfall differs from what is currently assumed, the drainage and ecological assessments may need to change.
These do not feel like small details that simply need tidying up later.
They concern the basic question of whether this site can actually support a development of this size without unacceptable consequences for the surrounding communities and environment.
What I am asking for
I am not asking for every nut, bolt and pipe to be designed before a decision is made.
I am asking for the fundamental questions to be answered first.
Before permission is granted, I believe there should be clear evidence confirming:
1. where foul water from 1,256 people will go and that the solution is achievable;
2. whether the existing sewerage and wastewater infrastructure has sufficient capacity;
3. where surface water will discharge and whether the receiving system can safely accommodate it;
4. the results of the necessary hydraulic modelling and the implications for flooding;
5. that Arncott Bridge Meadows SSSI and surrounding wildlife and watercourses will not be harmed;
6. Natural England's position once the final drainage information is available;
7. that sufficient potable water and electricity can actually be provided;
8. how much reliance will be placed on generators;
9. how transport for 1,256 Service Users will actually work;
10. that all associated vehicle movements have been included in the traffic and air-quality assessments; and
11. what the development-generated noise will mean for people already living in Piddington, Arncott and the surrounding area.
If these questions cannot currently be answered, then I believe the sensible and responsible course would be to defer the decision until they can be.
If permission is nevertheless being considered before these matters are resolved, I would ask for a clear explanation of why they are considered suitable to be dealt with after planning permission rather than beforehand, together with robust conditions preventing occupation until the necessary infrastructure and environmental safeguards have been demonstrated.
Finally

I understand why this application is being dealt with urgently. I understand the Government's desire to reduce reliance on asylum hotels and that alternative accommodation needs to be found.

But urgency should not mean that legitimate questions about whether a particular site is suitable are left unanswered.

This proposal isn't for a small number of people. It is for up to 1,256 people, potentially for at least ten years.

For those people, this site will become their home.

For those of us who already live in Piddington, Arncott and the surrounding area, we will live alongside the consequences of whatever decision is made.

And the wildlife, watercourses and countryside surrounding the site cannot simply be restored later if assumptions made now turn out to have been wrong.

After reading the applicant's own documents, I am left with one very simple question:

Do we actually know enough today to be confident that this particular site can safely and sustainably accommodate 1,256 people without unacceptable consequences for the people who will live there, the people who already live here, and the environment around us?

Based on the information currently available, I don't believe we do.

I therefore ask that the application is deferred until these fundamental questions have been properly answered and the necessary evidence is available to everyone making this decision.

Yours faithfully,

[redacted]

[redacted]

Piddington

Oxfordshire [redacted]

7. [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 13 September 2026

FORMAL OBJECTION – MOD BICESTER SITE A

Application Reference: PCU/RARE/C3105/3378843

Name: [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]

Date: 13th September 2026

Dear Crown Development Casework Unit,

I am a Piddington resident and homeowner who managed to find my forever home in a quiet hamlet/village location with no crime and a reasonable commute to work. I have had previous mental health concerns delt with and am in a good place to keep them at bay after settling here. My damaged hearing levels are easier to control here after struggling in noisy surroundings.

Along with the lovely people of Piddington and its location, it is a wonderful place to be and fit in with all the hard work that has led them and myself to be here.

All of what has been assessed and proposed for this SITE A development, has been rushed and not conducted in a reasonable manner. Everything the government has TOLD us is going to happen, I am against. I have shown my objection to the site on the grounds of noise pollution both to and from. As below.

1. Noise Assessment – assessed by noise into the development, not noise from the development

I am concerned that the submitted Noise Impact Assessment does not adequately assess the effect of the proposed development upon existing residents and surrounding communities.

The assessment principally considers the existing acoustic environment, particularly noise from the Thame Road, and whether future occupants of the proposed accommodation would experience acceptable internal and external noise levels. Its conclusion is that the site is subject to negligible-to-medium risk from existing road traffic noise and that sound insulation may be required in parts of the development.

However, this does not appear to constitute an assessment of noise generated by the development itself at existing off-site noise-sensitive receptors.

The proposal includes or potentially includes generators, wastewater-treatment and pumping infrastructure, kitchen and servicing activity, refuse collection, vans, HGVs, coaches, shuttle minibuses, car parking, recreational facilities and accommodation for up to 1,256 people. The separate Home Office correspondence also specifically contemplates mitigation to control generator noise.

I have been unable to identify within the Noise Impact Assessment or any other documents predicted operational noise levels at representative existing residential properties arising from these sources. Nor does the assessment appear to contain a substantive construction and demolition noise assessment.

This is particularly concerning because only two baseline monitoring locations were used, both within or immediately adjacent to the application site, and the survey was undertaken over approximately one weekday 24-hour period. The survey itself demonstrates that areas away from the Thame Road experience a substantially quieter acoustic environment.

The baseline monitoring used only two locations: LT01 on the western boundary adjacent to the Thame Road; and LT02 in the middle of Site A. The monitoring map on page 18 confirms those locations [Noise impact assessment.pdf]

These do not show an assessment receptor representing an existing dwelling in Piddington, Arncott or another nearby residential location.

Indeed, a search of the Noise Impact Assessment finds no identified external "receptor" at all.

Where is the assessment of operational noise generated by the proposed development at existing residential and other noise-sensitive receptors outside the site boundary? What will be the effect on existing residents if no representative existing residential noise-sensitive receptors appear to have been assessed?

The report says planning decisions should consider the likely effects of pollution, including cumulative effects, upon health, living conditions and the natural environment and should minimise adverse noise effects – this should be considered for both residents within Site A and surrounding areas.

Potential Issues:

Generator noise - a potential omission from the report.

It has been acknowledged that generators may be used and the Home Office discuss locating generators further from sensitive receptors, temporary acoustic screening, operating controls and generator fuel management. However, the planning Noise Impact Assessment contains no generator assessment.

There is no information or modelling on: generator sound power; number of generators; location; operating hours; night-time operation; tonal or low-frequency characteristics; cumulative operation of multiple units; predicted levels at existing homes. This to me is significant as the Utilities and Infrastructure Assessment acknowledges uncertainty over the permanent electrical supply.

What concerns me is, if generators form any part of the normal or contingency electricity strategy, why have their noise emissions not been modelled at the nearest existing residential receptors?

Could generators operate during the night-time period, and if so, what are the predicted façade noise levels at the nearest dwellings? I believe this needs to be assessed and shared openly.

Wastewater treatment and pumping noise have not been assessed

The drainage strategy potentially requires: an on-site wastewater treatment works; inlet pumping; surface-water pumping stations; associated mechanical equipment. However, the Noise Impact Assessment contains no information or assessment of a fixed plant.

If we consider that wastewater treatment plant and pumping equipment can operate for long periods, potentially including overnight, what will be the predicted noise impacts of the proposed treatment plant, including sewage pumping stations and surface water pumps particularly during the night?

Consideration as to whether these types of installations are essential to making the scheme operation should be known before permission is provided.

Transport - Service vehicles, deliveries, coaches and minibuses

The Travel Plan identifies a substantial variety of operational vehicle activity: vans; rigid HGVs; articulated HGVs; kitchen deliveries; refuse collection; coaches transporting Service Users; shuttle minibuses. There may also initially be wastewater tanker movements depending upon the drainage solution.

The Noise Assessment's criteria table recognises goods vehicle deliveries, servicing, forklift movements and car parks as potential noise sources. However I cannot see those proposed development sources being modelled at surrounding homes.

What assessment has been undertaken of early-morning or late-evening deliveries, waste collections, coaches, shuttle buses, reversing alarms, vehicle doors, loading/unloading and car-park activity?

This is especially important where such events are intermittent.

Construction and demolition noise appears significantly unassessed

Another potentially important gap is construction.

The report does not provide what I would regard as a construction noise impact assessment of: demolition; breaking existing concrete/hardstanding; earthworks; piling if required; construction traffic; modular-unit installation; generators/temporary equipment; working hours.

A search of the document finds references to "construction" essentially in the context of building construction methods and acoustic terminology, rather than a substantive construction-noise assessment.

Given the scale of the scheme and its phased delivery, where is the assessment of construction and demolition noise at surrounding residential receptors, including cumulative effects over the entire construction programme?

A Construction Environmental Management Plan can control details, but the Crown Development should still understand the likely magnitude and duration of the effects before granting permission.

Conclusion:

The need for accommodation may be urgent, but urgency does not remove the need for sound planning evidence. Whilst I have focused my objections on noise impact this proposal would introduce a substantial residential population into a rural site for an anticipated period of at least

ten years, with infrastructure that may need to operate continuously and with potential consequences extending beyond the application boundary.

Whilst my points focus on Generators, Waste Water, Transport and Construction all of these areas have other open questions which need to be taken into consideration which I am sure will be raised by other objections including but not limited too: foul-water solution remains unresolved, existing flooding is acknowledged, surface-water outfalls remain unconfirmed, and an on-site wastewater-treatment option may require third-party land and an as-yet-unidentified discharge location; Travel Plan separately acknowledges that the site's sustainable transport accessibility is not ideal, that pedestrian infrastructure is limited, and that the Travel Plan principally addresses staff and visitors rather than the 1,256 Service Users who will occupy the site; Finally, the Air Quality Screening Note concludes that detailed operational modelling is unnecessary only because predicted traffic is expected to remain below screening thresholds. It is therefore essential that the Council confirms that those traffic forecasts include the full range of Service User shuttle journeys, coaches, staff and visitor traffic, deliveries, refuse collection and any wastewater tanker movements required by the drainage strategy.

My question is: Has sufficient evidence been provided to give reasonable confidence that this site can safely, sustainably and appropriately accommodate 1,256 people without unacceptable consequences for residents, infrastructure, highways, flooding, wildlife and wider environment?

Based on the urgent Crown Development application and supporting documents, I believe this has not yet been demonstrated and therefore ask that permission is withheld until sufficient evidence has been provided to demonstrate the suitability of Site A. I believe currently this is not the right site for non-detained asylum accommodation.

I would appreciate my objection being placed on the official case file and be taken into account as part of the application decision.

Yours faithfully

[redacted]

[redacted]

Piddington

Oxfordshire [redacted]

8. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]
Date: 7th September 2026

[redacted]

[redacted],

Piddington,

Oxfordshire

[redacted]

7th September 2026

Crown Casework Unit Ministry of Housing, Communities and Local Government

Re: Objection to Urgent Crown Development Application MOD Bicester (Site A)

Application reference: PCU/RARE/C3105/3378843

Site: Bicester Garrison, Launton Road, Oxfordshire, [redacted]

Applicant: Home Office

Dear Sir/Madam,

I am writing as a resident of Piddington, a village directly adjoining the application site, to formally object to the above application for a 10-year temporary change of use of MOD Bicester Site A to provide non-detained asylum accommodation for up to 1,256 service users. My objections are based on the applicant's own supporting documents and are set out below in order of importance.

1. The applicant's own drainage report puts the sewage works as close as 45 metres from residential accommodation well inside its own stated safety margin

The Drainage Design Statement (Section 9.6, "Odour and Noise") states in terms that "a standard odour boundary from a WwTW [wastewater treatment works] is ~250m from the source of odour," and recommends odour modelling be carried out at 10m, 25m, 50m, 100m and 250m. The same document then confirms that the current masterplan allows only around 100m separation between residents and the WwTW in Phase 1, and that "the residential and welfare units are intended to be approximately 45m from the WwTW for future phases." It further confirms that Launton FC's Bicester Garrison Sports Ground, used by the local community, sits only around 130m from the intended WwTW location. On the applicant's own figures, the accommodation itself will sit at less than a fifth of the odour buffer distance that the same report says is standard for a facility of this kind, and the neighbouring community sports ground falls well inside it too.

2. Power, water and sewage infrastructure does not exist on site, and the applicant's own report says the design is not yet resolved

The Utilities and Infrastructure Assessment ("Operation Nettlefire," ref. ONF-15-RP-CV-100003) confirms: no on-site wastewater treatment works has been identified, and the "foul water strategy at RIBA Stage 2 is constrained by incomplete site information," with "key data gaps" including capacity at the municipal treatment works and the condition of the existing foul network (Section 4.6); the existing electrical infrastructure "cannot be relied upon," so temporary and/or permanent

generators are proposed to meet an estimated demand of approximately 2.16 MVA (Section 4.2); and potable water is to be “supplemented via a storage tank system” because the mains supply cannot be assumed adequate (Section 4.1). The report’s own summary and conclusion states plainly that the surface water strategy “is based on assumptions due to limited surveys, no stakeholder engagement, and incomplete site information, including the absence of ground investigation, CCTV surveys, and full topographical coverage” (Section 5). This is the Home Office’s own assessment that the basic services for over a thousand residents power, drinking water and sewage disposal remain unresolved and are, by the applicant’s own words, guesswork pending further surveys.

3. A decade of diesel generation is proposed, but its air quality impact has not been assessed at all.

The Utilities and Infrastructure Assessment confirms the existing electrical infrastructure “cannot be relied upon” and that temporary and/or permanent generators will be needed to meet an estimated maximum demand of approximately 2.16 MVA (Section 4.2), enough to indicate large-scale, sustained diesel generation is intended to substitute for a mains supply, potentially for the full 10-year life of the permission. Despite this, the Air Quality Screening Technical Note assesses only construction dust and vehicle emissions; it states in terms that vehicle-emission dispersion modelling “is not required” and confirms that “the baseline and operation phase dispersion modelling has not been undertaken.” Nowhere in the application is there any assessment of the NOx, particulate or CO2 emissions of the generators themselves, even though these are the source proposed to keep the site running. Separately, the Habitats Regulation Assessment/PEA mitigation section describes any on-site fuel as “minimal in volume” a characterisation that is difficult to reconcile with a site drawing 2.16 MVA from generators rather than the grid. The Fire Strategy Report, which would ordinarily be expected to address the storage and handling of bulk fuel for an installation of this kind, does not mention fuel storage at all. The applicant should be required to state the actual generator capacity, fuel storage and consumption figures, and to carry out a proper air quality assessment of operational-phase generator emissions, before this application can be considered adequately assessed on environmental grounds.

4. The site’s own ecology survey admits it is not a comprehensive assessment

The Preliminary Ecological Appraisal states that the site visit was carried out in late March, outside the optimal survey window of April–September, and concludes in its own limitations section: “this report cannot, therefore, be considered a comprehensive assessment of the ecological interest of the site.” Targeted surveys are still recommended, not yet completed, for hazel dormouse, Barn Owl, breeding birds, great crested newt, reptiles and terrestrial invertebrates, and pre-construction checks are still outstanding for badger and water vole (Section 5.0, Conclusions). Several trees on site were found to have features suitable for roosting bats. The same section confirms the site lies only 1.8km from Arncott Bridge Meadows SSSI and falls within its impact zone. A decision of this scale should not be made on an ecological baseline the applicant’s own ecologists say is incomplete.

5. Natural England itself flagged potential significant effects on the neighbouring SSSI, and the basis for later reassurance is not yet finalised

The Home Office’s own Written Statement on the EIA screening direction records that Natural England advised on 23 July 2026 that “the proposal could have potential significant effects on Arncott Bridge SSSI,” and that the hydrological connection between the site and the SSSI “cannot be ruled out.” Natural England’s later comfort, given on 11 and 13 August 2026, is expressly conditional on water quantity and quality being properly managed through the final drainage design, but the applicant’s own documents confirm that the foul water and surface water drainage strategies are still provisional and “have yet to be confirmed.” The conclusion that no full Environmental Impact Assessment is required therefore rests on a design that does not yet exist, for a site next to a statutory-designated wildlife site that a government advisor has already flagged as being potentially significantly affected.

6. The Transport Assessment's traffic and access conclusions appear to rely on data for the wrong road

The Transport Assessment repeatedly identifies the site access road as "the B1104" including the 7-day Automatic Traffic Counter results for both the northern and southern site accesses (Sections 3.9.2–3.9.6) and the local amenities description (Section 3.6.1) and Table 5-5 is titled "Traffic Impact B1104." However, the same document elsewhere correctly and repeatedly identifies the actual local road serving the site as the Thame Road (Sections 3.3.4, 3.4.2, 3.8.5), and the Utilities and Infrastructure Assessment likewise confirms a gas main runs "within the Thame Road" at the site boundary. There is no B1104 in this part of Oxfordshire. The B1104 reference appears in the same document that uses RAF Wethersfield in Braintree, Essex a site the applicant's own report calls "very similar in nature and scale" and whose traffic data has been used as "an appropriate proxy" for Bicester (Section 3.10, Section 5.3.13) raising the concern that traffic or access data intended for a different site has found its way into the assessment on which the access strategy for this site depends. The applicant should be required to confirm which figures in the Transport Assessment actually relate to the Bicester site before any weight is placed on them.

7. Key evidence, including on resident safety, has been withheld from public scrutiny

The Secretary of State has directed that a number of documents submitted in support of this application are "sensitive" under section 293B(11) of the Town and Country Planning Act 1990 and has withheld them from publication. On release, 11 sections of the application were reported to have been redacted, including the mitigating measures proposed for suicide and self-harm prevention, health and safety, and the handling of deaths on site. Residents and the local planning authority are therefore being asked to accept, without being able to see the evidence, assurances about matters that go to the heart of site suitability. A process that determines the future of a rural community for a decade, and that touches on the welfare of the people who would live there, cannot be considered to have had proper public consultation when this much of the underlying justification is not open to inspection.

8. This exact proposal was rejected at the same site in 2003, for reasons that remain unaddressed

In 2003, the then government's own proposal to use this site for asylum accommodation was tested at public inquiry and rejected. The planning inspector's stated reasons were that the site was too isolated, that it posed risks to social cohesion, and that it would strain local services. Nothing in the current application explains what has changed since 2003 to overcome those findings; if anything, the isolation of the surrounding villages is unchanged and the proposed capacity (1,256) is higher than what was previously rejected.

9. Statutory consultation has not been properly carried out

Bicester Town Council wrote to the Home Secretary on 14 July 2026, and again on 27 July 2026, raising concerns about planning and site suitability, infrastructure capacity, access and transport, community safety, environmental impact, and the absence of consultation with neighbouring communities. Both letters requested a substantive response by 1 August 2026. That deadline passed, and as of the date this application was validated (2 September 2026), neither the Home Office nor the Home Secretary had acknowledged or responded to either letter. Piddington and the other villages immediately adjoining the site as distinct from Bicester itself have received no direct consultation at all.

10. The scale and duration are disproportionate to the setting

The application seeks a 10-year "temporary" permission to accommodate up to 1,256 single adult men on a site adjoining villages that have none of the infrastructure to support a population of that size. Piddington, immediately adjacent to the site, is served by only four roads and has no school, shop, pub, or public transport of its own. Its only shared amenities the village hall and playing field

sit close to the site boundary and stand to become unusable in practice once the site is operating at this scale.

11. The site sits unusually close to a large number of schools

The government's own 2026 policy states that asylum accommodation should not be sited close to schools and nurseries, though it does not set a fixed distance. On official Get Information About Schools data, the nearest school to this site Langford Village Community Primary School is approximately 0.13 miles away in a straight line, with four schools within one mile and sixteen within two miles.

12. Pedestrian safety and local service capacity have not been demonstrated

The Transport Assessment itself confirms (Section 3.4.1) that "no footways are provided at the northern site access" and that all local roads are rural with grass verges rather than pavements. The Town Council's concerns about strain on local health services and policing have not been publicly answered, and no public information has been provided showing that NHS primary care, policing, or the local road network can absorb a resident population and associated staff of this scale for a decade.

Conclusion

For the reasons set out above, there are significant and unresolved concerns surrounding this proposal. These include the sewage treatment works being located at a distance that falls substantially short of the applicant's own recommended separation distance from residential accommodation; the admitted lack of resolved power, water and sewage infrastructure; and an ecological baseline which the applicant's own consultants acknowledge is incomplete.

There are also serious concerns regarding the potential impact on a neighbouring Site of Special Scientific Interest (SSSI), following warnings from Natural England that potentially significant effects have not yet been fully resolved. In addition, apparent errors within the Transport Assessment raise questions about the reliability of the underlying traffic data and, consequently, the conclusions drawn from it.

More fundamentally, this is an unsuitable location for a development of this scale. Its remote setting presents challenges for those who would be accommodated there, while the scale and nature of the proposal would place a disproportionate burden on the surrounding villages and their existing infrastructure and services. The substantial additional works and infrastructure required also raise legitimate concerns about whether this represents an appropriate and responsible use of public funds.

In light of these significant unresolved issues, I respectfully request that the application be refused.

At the very least, the representation period should be extended, all previously withheld or unavailable documents should be released, and the discrepancies and omissions identified above should be fully addressed. Any corrected assessments and supporting documents should then be re-published and made available for proper public consultation before the application is determined.

Yours faithfully,

Mr [redacted]

[redacted]
[redacted]
Piddington
Oxfordshire.
[redacted].
United Kingdom

Email: [redacted]
Mob: +447713081822

9. [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 13th September 2026

[redacted]

[redacted],

Piddington,

Oxfordshire

[redacted]

13th September 2026

Crown Casework Unit Ministry of Housing, Communities and Local Government

Re: Objection to Urgent Crown Development Application MOD Bicester (Site A)

Application reference: PCU/RARE/C3105/3378843

Site: Bicester Garrison, Launton Road, Oxfordshire, [redacted]

Applicant: Home Office

Dear Sir/Madam,

I am writing to formally object to the proposed asylum accommodation at the MOD site.

As an 18-year-old woman living locally, I am genuinely frightened by the scale and nature of this proposal. The accommodation of up to 1,250 single adult men in one location represents a very significant change to the character and intensity of use of the site and surrounding area.

My concerns about personal safety are genuine. I should be able to walk locally, use public spaces and travel home in the evening without feeling unsafe. I believe the potential impact on the safety and quality of life of existing residents, particularly young women, needs to be properly assessed as part of the planning process.

I am also concerned about the capacity of local policing and emergency services to deal with the additional demands created by a development of this exceptional scale. The application should provide clear evidence that adequate security, access control, emergency response and policing arrangements will be available.

I am equally concerned about the ecological impact. There are protected species in the area, including bats and great crested newts. I believe a comprehensive ecological assessment should establish the presence of protected species and habitats and demonstrate that they will not be adversely affected by the proposed development.

The planning assessment should therefore properly consider:

* public safety, security and fear of crime;

* the exceptional scale and intensity of the proposed use;

* the impact on local policing and emergency services;

* traffic and pedestrian movements associated with the development;

* the impact on the character and amenity of the surrounding rural communities;

* protected species, including bats and great crested newts;

* potential impacts on habitats and biodiversity; and

* whether appropriate mitigation can realistically address these impacts.

I appreciate that asylum seekers themselves should not be judged by nationality or immigration status. My objection is to the planning implications of accommodating such a large number of single adult men at this particular location and the resulting impact on public safety, local services, the environment and the existing community.

I strongly object to the proposal and ask that these matters are properly assessed and given appropriate weight when determining the planning application.

Yours faithfully,

[redacted]

Email: [redacted]

Mobile: [redacted]

10. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: 11 September 2026

[redacted]

[redacted],

Piddington,

Oxfordshire

[redacted]

11th September 2026

Crown Casework Unit Ministry of Housing, Communities and Local Government

Re: Objection to Urgent Crown Development Application MOD Bicester (Site A)

Application reference: PCU/RARE/C3105/3378843

Site: Bicester Garrison, Launton Road, Oxfordshire, [redacted]

Applicant: Home Office

Dear Sir/Madam,

I am writing to formally object to the proposed use of the MOD site for asylum accommodation.

My objection is based principally on public safety, security, the exceptional scale of the proposal and the suitability of this location for accommodating such a large population of single adult men.

The proposal represents a fundamental change in the scale and intensity of activity at this site. This is not a small residential development. It would create a substantial accommodation facility for a very large number of single adult men in an area surrounded by comparatively small rural communities.

The combination of the number of occupants, the predominantly male demographic, the intensity of the proposed accommodation and its location must be properly assessed.

As a woman living in the local community, I am particularly concerned about the consequences for personal safety and the potential impact on the way local residents are able to use roads, footpaths and public spaces, particularly during evenings and at night. I should be able to travel locally, walk in the area and use public spaces without feeling unsafe or anxious.

I recognise that individual occupants must not be prejudged and that asylum seekers are entitled to be treated fairly. However, that does not mean that the demographic characteristics and exceptional concentration of occupants are irrelevant when considering the practical security and public-safety implications of a proposed development.

The planning system expressly recognises public safety, security, crime, disorder and the fear of crime as legitimate considerations. Where a development involves a very large number of people being accommodated together, these matters require particularly careful assessment.

I am therefore concerned that the application must demonstrate, with evidence rather than general assurances, that the proposed development can be operated safely and securely without creating unacceptable risks or pressures for the surrounding community.

In particular, I believe the following matters require detailed assessment: the maximum number of single adult men to be accommodated; the proposed ratio, qualifications and experience of on-site security personnel; 24-hour security arrangements and incident-response procedures; perimeter security and controlled access; arrangements for managing occupants entering and leaving the site; the potential impact on local roads, footpaths and surrounding communities; anticipated additional demand on Thames Valley Police and other emergency services; emergency access, evacuation and major incident procedures; arrangements for dealing with crime, disorder and anti-social behaviour; measures specifically designed to protect women and other potentially vulnerable members of the existing community; and whether the proposed security arrangements are genuinely proportionate to the exceptional number and demographic profile of the proposed occupants.

The surrounding community should not be expected simply to accept a significant change in its security environment without proper evidence that the associated risks have been identified, assessed and adequately mitigated.

I therefore ask Crown Developments to provide clear evidence addressing these matters rather than relying upon general assurances that the site will be appropriately managed.

To be clear, my objection is not based on nationality, ethnicity or immigration status. It concerns the proposed land use, the extraordinary scale of the accommodation, the concentration of single adult men at one location, the resulting security considerations and the suitability of this particular site.

A development of this magnitude should not be approved unless there is compelling evidence that it can operate safely and securely without placing an unacceptable additional burden on the surrounding community, local infrastructure or emergency services.

For these reasons, I strongly object to the proposal and ask that these public-safety and security concerns are given proper and substantial consideration in the planning process.

Yours faithfully,

[redacted]

[redacted]

Piddington

Bicester

[redacted]

Email: [redacted]

Mobile: [redacted]

11. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 13 September 2026

FORMAL OBJECTION – MOD BICESTER SITE A

Application Reference PCU/RARE/C3105/3378843

[redacted],

[redacted],

Piddington,

[redacted]

Date 13 September 2026.

Dear Crown Development Casework Unit

I am writing as a resident and local land owner, farmer of Piddington to formally object to the planning application PCU/RARE/C3105/3378843 (proposed 1,256-person asylum accommodation centre at Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, [redacted].)

I wish to state that my objection to the use of this site is not an objection to people seeking asylum. It is an objection to the size of the development, its suitability and to the effect on the surrounding area and people to be housed there. Having studied the documents provided, my objection questions whether the application has thoroughly explored all necessary assessments and established that this site is appropriate.

The site entrance is on the Thame Road. This is a road I use frequently and it is fast and always very busy.

There are no footpaths, no street lights and often accidents. Widnell Lane, which I travel and walk often, along with all other roads around the site and in the local area are narrow, rural roads with no footpaths or lighting.

The documents Transport Assessment confirms this and refers to an ‘’absence of any pedestrian infrastructure serving the site’’ The documents suggest that mini buses will be provided to transport up to 1256 people. The document states that people will be free to come and go and does not state this will only be by minibus consequently suggesting these people will need to walk. The document does not address the risk or health and safety of these people or that of the road users. It states that due to the need for a fast-track application no pre-application assessment was prepared.

Within the documents submitted I would also like to bring attention to the application form section 19 which states that the use is for C2A which is secure institutions similar to prisons and secure hospitals, however the Home Office has stated that this is not a secure institution as the residents are free to come and go day and night, 7 days a week and therefore the application should NOT be

classified under the class stated as this is not a true reflection of the proposal.

There are many inconsistencies within the documents when describing the site. Some documents state it is vacant and non -operational, a green field site, others that it is in active use for defence storage. It is in fact a former Army Ordinance depot with hardstanding, former rail sidings and a history of handling munitions. I have not seen any detailed assessments of the safety of this site for transformation to homes for the 1256 people anticipated to use it.

The application does not submit detailed plans of the proposed site layout, lighting, boundary and security fencing or drainage layouts. On July 14th 2026 the Home Office was asked in Parliament what

assessments had been made of the adequacy of utilities and infrastructure at Site A. The answer was

‘’suitability assessments are ongoing ‘’ and that these assessments would consider the above as well

as operational planning including impacts on local services and communities. Many details within the

documents submitted seem to list unresolved and outstanding assessments. Surely these finalised assessments should be available to establish whether this site is suitable or not.

The application refers to the planning for the site as Urgent and temporary and states a period of at least 10 years but it also refers to the facilities being designed for longer case use. This does not make

sense to me as longer use suggests ongoing use for a period of time unknown.

The proposal is for homes for 1256 single adult males, I am a resident of Piddington which is the nearest settlement and borders the proposed facility, the current population of which is around 340 residents being elderly, working age and families. This application is for four times the capacity of a very quiet village and I have serious concerns with regard to the impact on our village. There are no

facilities within the village, no shop, no pub just a church and village hall, we also don’t have any street lighting after mid night and no pavements to walk on. It is extremely concerning that this facility with open doors is proposed in such a rural location with no amenities close by.

There is no evidence that Thames Water has confirmed in writing that the network can accommodate

the scale of demand needed and Piddington already has low water pressure. There are little considerations given to the regular, high-risk flooding of the site which happens during wet weather and references to handling waste water are described as provisional. Electrical power, the applicant

proposes to supply using a diesel-powered generator. Not only creating air pollution but also significant noise. This will affect the surrounding ecology which is well established on this site and in

surrounding countryside. Once again, I question the choice and suitability of this site and its proposed change of use.

I understand that some aspects of a planning application are developed after the planning has been

approved. But this application fails to produce many assessments, operational planning and evidence

which establishes it as a safe and suitable site for conversion to accommodate 1256 asylum seekers.

These are some objections that I raised having considered the application for the use of Site A MOD

Bicester, they are not political objections. I would like them to be considered carefully and ask that

planning consent is not given until all questions and assessesments have been resolved and the

necessary evidence produced for proper consideration of the site.

I would be grateful if this objection could be placed on the official case file and considered when the

application is determined.

Application Ref – PCU/RARE/C3105/3378843

[redacted],

[redacted],

Piddington,

[redacted]

Date 13 September 2026.

12. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 14 September 2026

FORMAL OBJECTION – MOD BICESTER SITE A

Application Reference PCU/RARE/C3105/3378843

[redacted],

[redacted],

Piddington,

[redacted]

Date 14 September 2026.

Dear Crown Development Casework Unit

I have been a resident of, and farmer in Piddington for 36 years. I write to you to formally object to the planning application PCU/RARE/C3105/3378843 (proposed 1,256-person asylum accommodation centre at Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, [redacted].)

In the early 2000s a smaller accommodation centre was proposed (750 people). Following a fourteen-day inquiry, an independent inspector found the location would be unsustainable, isolated, and a strain on local services. The current proposal which the Home Office has applied for under the fast track ‘’urgent Crown development procedure’’ is much larger (1256 asylum seekers) and the planning application does not evidence details, surveys and summaries which suggest it would be any different, in fact many sections of the application are either redacted, left blank or contradict each other.

With my livestock farm on the edge of the village, guaranteed water supply is essential. Low pressure water is at present the norm. This summer has again highlighted the very real problems of water shortage and the fact that water supplies throughout the country need improvement. This application proposes to house another 1,256 males on this site. It does not state how all the water requirements for the site, the village and surrounding countryside will be met. There is no evidence that Thames Water has confirmed in writing, that the network can accommodate this scale of additional demand.

Water will also need to be available for fire safety which has not been addressed. There does not appear to be any indication regarding how a fire or major incident would be handled on or around the site.

Drainage of waste from the site for upward of 1400 individuals will far exceed that of villages within the area. Figures suggest that Bicester Sewage works, although upgraded to a larger capacity, is working at a very high capacity and may already be making discharges . Bicester itself continues to grow as do local villages thus adding more strain to the system. Before any major development application is even considered I would expect these potential problems to be fully investigated and

addressed. There is no evidence of this in the application. The application suggests a provisional on-

site foul drainage system with tankers removing waste. This on a site which often floods and is close

to SSSI fields.

My main objections to this planning application are the complete lack of evidence of planning,

surveys, assessments and compliance showing the ability to deliver a safe, healthy environment to

both the site and surrounding villages.

The application ignores the usual precursors for a planning application, seemingly willing to ignore

concerns, safety, ecology studies and equality. No diligent studies appear to have been carried out to

highlight the safety of roads around the site and rural area, species present on the site and

communities affected by the proposals. In fact, the majority appear to be desktop reports. There is no

consideration shown relating to the effects of the removal of Nissan huts, debris and rubble from the

site and a new constructions resulting in an increase of heavy machinery on the local roads. There is

no reference to the noise and light pollution which will affect the local area and ecology during

construction and once the site is occupied., A diesel generator is suggested to supply electricity which

will not only be noisy but will need tankers of diesel adding to traffic and polluting the surrounding air

quality.

The site entrance is on the Thame Road. This is a road I use frequently and it is fast and always very busy.

There are no footpaths, no street lights and often accidents. Widnell Lane, which I travel and walk

often, along with all other roads around the site and in the local area are narrow, rural roads with no

footpaths or lighting.

The documents Transport Assessment confirms this and refers to an ‘’absence of any pedestrian

infrastructure serving the site’’ The documents suggest that mini buses will be provided to transport

up to 1256 people. The document states that people will be free to come and go and does not state

this will only be by minibus consequently suggesting these people will need to walk. The document

does not address the risk or health and safety of these people or that of the road users. It states that

due to the need for a fast-track application no pre-application assessment was prepared.

The application does not submit detailed plans of the proposed site layout, lighting, boundary and

security fencing or drainage layouts. On July 14th 2026 the Home Office was asked in Parliament what

assessments had been made of the adequacy of utilities and infrastructure at Site A. The answer was

‘’suitability assessments are ongoing ‘’ and that these assessments would consider the above as well

as operational planning including impacts on local services and communities. Many details within the

documents submitted seem to list unresolved and outstanding assessments. Surely these finalised

assessments should be available to establish whether this site is suitable or not.

I wish to state that my objection to the use of this site is not an objection to people seeking asylum. It

is not a political objection. It is an objection to the size of the development, its suitability and to the

effect on the surrounding area and people to be housed there

These are some objections that I raise having considered the application for the use of Site A MOD

Bicester, Having studied the documents provided, my objection questions whether the application

has thoroughly explored all necessary assessments and established that this site is appropriate.

I would like this to be considered carefully and ask that planning consent is not given until all

questions, surveys and assessments have been resolved, released and the necessary evidence

produced for proper consideration of the site by all it affects.

I would be grateful if this objection could be placed on the official case file and considered when the

application is determined.

Application Reference PCU/RARE/C3105/3378843

[redacted],

[redacted],

Piddington,

[redacted]

Date 14 September 2026.

13. [redacted]

Address: [redacted], Piddington
Date: not stated

My objections to this site;

1. Dangerous road [redacted], not suitable for walkers or cyclists.

Traffic Survey taken 11.09.2026 5am - 8pm 6,921 vehicles passed the site 'A', most exceeding the speed limit.

Historically there have been deaths on this road.

2. Generators for electricity x2 using 20,000 litres of diesel daily for 7 days a week, 365 days a year will cause contamination and emissions exposure to local adults and children.

Sewage overflows as site floods in winter.

3. Current records at Thames Valley Environmental Records Centre state within the 2km site there are 12 protected Bat species, a few very rare.

Great Crested Newts and Hazel Dormice on the site, 66 bird species, 27 of which are on the UK Conservation Red List, 188 rare and protected wildflowers, one- The Devils Bit Scabious has its own county recovery plan.

A proper ecological field assessment must be carried out.

Yours faithfully,

[redacted],
[redacted],
Piddington

14. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 14/09/26

Dear Sir or Madam,

I am writing to object to the proposed development at Site A, MOD Bicester.

My name is [redacted] and I live at [redacted], Piddington, [redacted]. My family and I have lived in Piddington since 2019. We have three daughters, aged 7, 9 and 11, and the site in question sits immediately alongside the community in which we are raising them.

My objection is based not only on the impact of this proposal on the surrounding villages, but on a concern I feel has received far too little attention: the welfare implications of accommodating 1,256 men together on a single, isolated site.

It is the scale and concentration of this proposal that particularly concerns me. We are not talking about a small number of people being accommodated within an existing community, with ready access to shops, services, employment, public transport and ordinary day-to-day interaction. The proposal is to accommodate 1,256 men together in one location, on a former MOD site beside a tiny rural village.

Many of the men housed there may have experienced displacement, trauma, separation from family and considerable uncertainty about their futures. It seems entirely reasonable to ask whether concentrating such a large number of people, some of whom may already be vulnerable, in an isolated setting is an appropriate model for their welfare.

This concern is supported by evidence from the World Health Organization. The WHO states that refugees and migrants exposed to adversity are more likely than host populations to experience mental health conditions including depression, anxiety, post-traumatic stress disorder, suicide and psychoses. It identifies the circumstances people experience after migration as important determinants of their mental health.

In particular, the WHO identifies poor living conditions, separation from family and support networks, uncertain legal status and barriers to accessing healthcare and other services as post-migration stressors. During integration and settlement it identifies unemployment, social isolation and tensions with host populations among the further pressures that can affect mental health.

Conversely, the WHO identifies community support as a protective factor and recommends promoting community support and social inclusion, addressing people's basic needs and ensuring access to appropriate healthcare and mental health services.

Against that evidence, I believe the proposed scale of Site A requires much greater scrutiny.

What are the welfare implications of placing 1,256 men, many potentially experiencing the same uncertainty and inability to move forward with their lives, together on one isolated site? How will meaningful social inclusion be achieved at that scale? How will vulnerable individuals be identified and supported? What provision will there be for meaningful activity, mental healthcare and integration with the wider community?

We should not assess the suitability of Site A simply by asking whether there are enough buildings or beds in which 1,256 men can physically be accommodated. We need to consider what their lives would actually look like once they were here.

There is also a wider consequence of concentrating 1,256 people in this way which I believe requires proper consideration.

The WHO identifies social isolation, uncertain legal status, unemployment, poor living conditions and tensions with host populations among the factors that can adversely affect refugee and migrant mental health. It seems unreasonable to consider those factors purely as questions of individual welfare without also examining how the pressures created by such a large institutional

setting could affect relationships within the site and with the communities immediately surrounding it.

This is not to suggest that asylum seekers are inherently dangerous, nor that experiencing trauma or mental ill-health makes somebody a threat. It is a question of scale, environment and responsible safeguarding.

Any population of 1,256 people will contain individuals with different needs, vulnerabilities and behaviours. Bringing such a large population together in one place, particularly where residents may have limited opportunities for work, recreation, social integration or independent travel, inevitably creates challenges that need to be anticipated and managed. Those challenges affect both the people living at Site A and the small communities surrounding it.

That is particularly important here because of the extraordinary difference in scale. Piddington is a village of only a few hundred residents. The proposed accommodation would therefore introduce, immediately beside it, a population several times the size of the existing village.

The proposal should properly assess not only how the mental health and welfare of those 1,256 men will be protected, but how problems arising within such a large accommodation setting would be prevented and managed, and how neighbouring communities would be protected from any resulting impacts.

The WHO itself identifies tensions with host populations as a potential post-migration stressor. Surely that makes it even more important to ask whether concentrating 1,256 men beside a very small rural community, rather than accommodating people on a smaller and more integrated basis, is conducive to good outcomes for either group.

My concern is therefore not based on an assumption about how these men will behave. It is that the proposed model may create conditions in which difficulties are more likely to arise, while placing both the men themselves and the surrounding communities in a position where they must live with the consequences if the provision proves inadequate.

The characteristics of this particular location compound those concerns. Piddington is a tiny rural village. We have no shop, no pub and no school. There is very little within walking distance of the proposed accommodation and public transport is limited. The surrounding roads are rural and in many places unsuitable for pedestrians.

There is therefore an enormous mismatch between the scale of the population being proposed and the scale of the community and infrastructure surrounding it.

There is also important history here. A smaller accommodation centre, capped at 750 people, was proposed nearby in the early 2000s. It was subjected to a fourteen-day public inquiry and an independent Inspector concluded that the location was unsustainable, with concerns including its isolation, community cohesion, local services and pedestrian road safety.

More than twenty years later, the fundamental geography of this site has not changed. It has not become less isolated. Piddington has not acquired shops, services or substantial public transport infrastructure. Yet the current proposal is considerably larger than the scheme subjected to that scrutiny.

I find it particularly troubling, therefore, that a proposal to accommodate 1,256 people is being pursued through the fast-track "urgent Crown development" route rather than receiving the level of independent examination afforded to the smaller previous proposal.

Urgency should not lower the standard by which we judge the welfare of the people who will actually have to live there, nor the responsibility to consider the communities who will live alongside it.

I appreciate the very real national pressures surrounding asylum accommodation, and I do not object to the principle that people seeking asylum need somewhere safe to live while their claims are considered. My objection is to the suitability of this particular model, at this particular scale, in this particular location.

I believe it is entirely possible to hold two concerns at the same time: concern for the existing community and concern for the men who would be placed here. Neither should cancel out the other.

For me, the fundamental question is not simply, "Can 1,256 men be accommodated here?" It is, "Is this an appropriate place for 1,256 men to live?"

And, if concentrating such a large number of people on one isolated site is considered preferable to smaller-scale accommodation offering greater access to existing communities, services and support networks, I believe the Government should be required to explain the evidence on which that conclusion is based.

Before this proposal proceeds, there must be proper independent examination of its welfare and community implications, including mental health provision, access to healthcare, opportunities for meaningful activity, transport, social connection and community integration, safeguarding and the potential effects of isolation and prolonged uncertainty.

The WHO's recommendations emphasise community support, social inclusion, access to services and addressing the social circumstances that affect mental health. It is incumbent on those proposing Site A to demonstrate, in detail, how accommodation of this nature and scale in this location is compatible with those principles.

I therefore ask that this application is subjected to proper independent scrutiny and that the welfare of the people who would be housed at Site A, together with the implications of concentrating 1,256 men in this location for the surrounding communities, are treated as central considerations rather than afterthoughts.

I would be grateful for acknowledgement that my objection has been received and placed on the official case file, and I would like to be kept informed of the next steps.

Yours faithfully,

[redacted]

[redacted]

Piddington

[redacted]

15. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: not stated

Dear sir/madam

I am currently a resident of Piddington village in Oxfordshire and I am writing about the proposed development of an asylum seeker Centre on MOD Bicester Site A located on the Thame Road, ref PCU/RARE/C3105/3378843.

I have lived in Piddington for the last 15 years with my wife and our three children who have grown up there from the ages of four up to leaving for university or work. Before that, we lived in Murcott and also before that in Ludgershall in 2003 when the original application for this site was rejected on several grounds. We are very familiar with this area, we walk and cycle around the local roads. We travel into Bicester on a regular basis and our children have attended schools in the area. None of the immediate infrastructure around the site has changed in the last 25 years apart from an expansion of the prison and the addition of a traveller site on Widnall Lane. I believe that has also been a development of a concrete processing company opposite the prison. Traffic on the local roads has increased because of these developments and is often used as an alternative route to the M40 when it's congested and also by lorries seeking to avoid the low bridge on the A41. The speed limit on the road has been reduced to 50mph since 2003, however it has no pedestrian footways and is entirely unsuitable for pedestrians. Palmer Avenue provides an alternative route towards Bicester via Arncott and Ambrosden, but this has a National speed limit and no pedestrian footway.

Bicester has grown significantly over the last decade, but this has placed strain on the utility services in the area, as noted in the report prepared by the Home Office. The site has never been used for human habitation and is currently not fit for that purpose as it lacks the sufficient power, water and waste facilities. The site requires significant development over several months to be converted for the purposes proposed and without mains utilities will increase the traffic on the Thame Road in terms of tankers delivering and removing from the site.

The planning proposal has been declared an urgent national matter, yet has already been ongoing for several months and would take several more to become operational where it is planned to be in use for ten years. This seems somewhat outside the definition of urgent and also far from temporary.

There are a number of inconsistencies within the application which should be clarified or corrected before the application can be properly assessed. Similarly there are incomplete sections and outstanding investigations which must be complete to adequately assess the proposal. For example, there are no plans for elevations or boundaries, basic elements of planning applications. There has been no assessment of potential light pollution. The site is a habitat for different species of protected bats which will undoubtedly be affected by increased lighting requirements. Our house in Piddington is already affected by light pollution from the prison and this site is closer to our home than the prison.

The proposed population of 1250 all male service users is far in excess of any individual local village population and is over 3 times the population of Piddington, the closest village. There is no plan included for how service users (which are cited as over 3,000 in other parts of the report) will be safeguarded, nor any mention of how this population will integrate with the local population, which they are free to do. There is no definite plan for healthcare, wellbeing, health and safety or even unexploded ordnance on site. The site will also need to accommodate staff, on different shifts and staying on site, with further increases the utility requirements and traffic flow. Although cost is

not a planning matter, it is relevant to this being an urgent matter, as the site is being proposed on this basis as a lower cost alternative to hotels or HMOs, however there is no mention of cost anywhere in this proposal. If it is an urgent national matter it should include the cost evaluation, including the full site development costs. If it does not include these then it should be treated as a planning application for consideration by Cherwell authorities. National planning guidance requires that both national importance and urgency be demonstrated at the level of the individual site, not simply asserted by reference to a general national problem. The application does not state why this specific site is urgent or of national importance.

Furthermore, the Application Form records the proposed use class as C2A – Secure Residential Institutions, which is the same use class used for prisons and detention centres. Under international humanitarian law asylum seekers cannot be detained indefinitely and the information provided in relation to this site has always been that service users will be free to come and go. The application needs to be absolutely clear on the proposed use and treatment of service users.

I am challenging this notice based upon the fact the report is clearly incomplete and various evaluations relating to the report are clearly incomplete, therefore this notice should be rejected and a resubmission requested that is complete, including all of the requisite reports and surveys and then subjected to normal planning process and review i.e. not treated as a national urgent matter.

Yours faithfully

[redacted]

[redacted]

Piddington

Bicester

[redacted]

16. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]
Date: 13 September 2026

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

13th September, 2026

URGENT ATTENTION OF:

Crown Casework Team

Planning Casework Unit

(crowncasework@communities.gov.uk)

Dear Sir/Madam,

Ref: PCU/RARE/C3105/3378843

I'm writing to formally object to the proposal to accommodate up to 1,250 asylum seekers in Piddington.

Initially, I want to be very clear that my objection is not directed towards people seeking asylum. I have huge empathy for anyone who has been forced to leave their home because of war, persecution or circumstances beyond their control. People seeking safety deserve dignity, compassion and appropriate support.

My own concern is whether Piddington is an appropriate location for a development of this unprecedented scale and above all, whether the safety and safeguarding of everyone affected by this proposal has been properly considered. This is about people, safety, vulnerability and the responsibility to make sure that safeguarding is properly considered before a development of this nature is allowed to proceed.

For me, my greatest concern is safeguarding.

I've worked extensively with a UK charity supporting people affected by sexual abuse and rape. I've a strong understanding of the importance of safeguarding and in particular, the need to identify potential risks early, take concerns seriously and put appropriate measures in place to protect people from harm.

I feel very strongly that safeguarding cannot be treated as an afterthought in a proposal of this scale. Safeguarding is about prevention. It is about identifying potential risks, properly assessing them and putting appropriate protections in place before a situation arises, rather than waiting for something to happen before responding.

I'm not making assumptions about the people who would be accommodated at the centre, nor am I suggesting that people seeking asylum are inherently dangerous. My concern is that with a

proposal involving 1,250 (or in excess of) adult males aged 18 to 65, the safeguarding implications for everyone need to be properly and independently assessed.

As residents we are entitled to clear evidence that those risks have been identified, properly assessed and appropriately addressed before the centre becomes operational.

A development accommodating up to 1,250 adult males aged 18 to 65, in a small rural community, represents a fundamental change to the local environment and the community around it. It is not unreasonable, prejudiced or discriminatory to ask serious questions about safeguarding and community safety in these circumstances.

Women and children have a right to feel safe in their own community. As do elderly and vulnerable residents. Those seeking asylum also have an absolute right to be safe and properly protected. Both groups have an absolute right to safety. One should never be achieved at the expense of the other. Safeguarding cannot be based on assumptions about individuals. It needs to be based on evidence, proper risk assessment, prevention and robust planning.

The question I believe needs to be answered is very simple: Have the safeguarding risks associated with a centre of this size, in this particular location and with this particular operational model, been fully identified, independently assessed and properly addressed? I do not believe residents have yet been given sufficient evidence to answer that question with confidence.

We deserve clear and transparent information about safeguarding risks, independent assessments, measures to prevent harm, access to policing and emergency services, how women, children and vulnerable residents will be protected.

It is simply not good enough to tell residents that safeguarding arrangements will be in place. We need to see the evidence, understand the risks and know exactly how those risks will be managed.

Safeguarding should not become an operational issue to be dealt with once the centre is already occupied. Safeguarding should come first. Prevention should come first. Proper risk assessment should come first.

The scale of the proposal makes safeguarding even more important. We are an incredibly small rural community. Accommodating up to 1,250 people represents an enormous increase in the number of people living in the area and would fundamentally change the nature of the community.

Our roads, public transport, local services and wider infrastructure were simply not designed for an increase in population on this scale.

The Government has a responsibility to provide safe and appropriate accommodation for people seeking asylum, and I fully recognise that responsibility. But that responsibility also extends to the communities being asked to accommodate such a significant number of people.

The Government has a duty to ensure that the location is genuinely suitable and that the safety and wellbeing of existing residents are properly protected.

Compassion and responsibility should apply to everyone affected by this decision.

Women and children's safety

As mentioned above, I'm particularly concerned about the potential impact on women and children living in and around Piddington. I do not believe women should be expected to ignore or suppress legitimate concerns about their personal safety simply because the people being accommodated are seeking asylum. Equally, I don't believe those seeking asylum should be treated as though they are inherently dangerous - both things can be true. We can have compassion for people seeking refuge and ask difficult questions about safeguarding. In fact, I'd argue that asking those questions is exactly what responsible safeguarding requires.

Women and children should be able to walk through their own community and go about their daily lives feeling safe. That should never be regarded as an unreasonable expectation.

So I would ask those making this decision a very simple question: at what point do we stop asking women to accept increasing concerns about their safety as simply something they have to live with? Do we, as women, now need to consider seeking asylum in another country because the United Kingdom is no longer considered a safe place for us to live?

I find that a deeply uncomfortable question to even have to ask. Women should not have to leave their own country, their own communities or their own homes in order to feel safe.

The safety of women and children must matter in this decision. It cannot be treated as secondary, inconvenient or something that can be addressed once the centre is operational.

In addition to this is our rural location and lack of local infrastructure, amenities. We have no healthcare, shops, services and emergency support near us. These are not just infrastructure issues, they also have safeguarding implications, particularly for vulnerable people and in emergency situations.

Then there are the environmental and ecological concerns. This site is in Flood Zone 3 and near a Site of Specific Scientific Interest with Natural England requesting further information and further ecological surveys required for protected species.

To conclude. This should not feel like a decision that has already been made and is simply being presented to the community as a fait accompli. For all of my reasons above, I strongly object to the proposed accommodation of up to 1,250 asylum seekers in Piddington.

My objection is not about where people come from or why they have sought asylum. I have compassion for people who are seeking safety.

My objection is about whether this particular location, at this particular scale and with this particular operational model, is appropriate and safe.

Above all, I believe safeguarding must be properly demonstrated before this proposal is allowed to proceed. We should not wait for something to go wrong before asking whether the risks were properly considered.

I therefore respectfully ask that my objection be formally recorded and that the safeguarding, environmental, ecological, infrastructure and community impacts of this proposal are fully and independently assessed before any final decision is made.

Yours faithfully,

[redacted]

17. [redacted]

Address: [redacted], Piddington, [redacted]
Date: not stated

OBJECTION TO PCU/RARE/C3105/3378843

CROWN DEVELOPMENT COMPRISING THE TEMPORARY CHANGE OF USE OF THE DEFENCE STORAGE & DISTRIBUTION CENTRE, MOD BICESTER SITE A.

Dear Sir/Madam,

My husband and I are both local residents of Piddington and have been living here since we married in 1969. We have experienced the previous proposal to accommodate between 500 - 750 people, as families , back in 2003. At this point the site was deemed to be unsafe, wrong location, and would not demonstrate value for money. My question would be what has changed since 2003 as the infrastructure will have deteriorated, the traffic levels have increased an overall call on local resources in the Bicester area increased. This will also continue as Bicester has been identified as a future Garden Town.

I strongly object to the proposal of changing the use of Site A Bicester from its current purpose to accommodating between 1256 and 3500 single male asylum seekers on the basis of:

1. Wrong location - it is located on a busy main road, Thame Road which has no footpaths, and no street lights. It has recently experienced fatalities and multiple accidents. The fatalities included a small child at the Blackthorn turning.

2. Infrastructure - the current site is a distribution centre with insufficient capacity for water, gas, electricity or sewerage to accommodate this number of people, meaning this would all need to be developed or brought in. Evidence shows that the sewerage plant and electricity capacity are both full for Bicester and surrounding areas.

3. Value for money - currently there are no official figures to outline how much this will cost both in set up and running costs . The case has not been proven that this is value for money.

Yours sincerely,

[redacted]
[redacted], Piddington, [redacted]
[redacted]

18. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 12/09/2026

[redacted]

[redacted]

Piddington

[redacted]

12/09/2026

To whom it may concern

I am objecting to the planned proposal of housing 1256 illegal immigrants at the MOD site A in Piddington.

1. The land can be prone to flooding. It won't be easy to rescue and re locate 1256 men in the instance of a flash flood. A scary scenario for all involved.

2. Expensive overall cost to make the site habitable.

3. Safety. Theirs and ours

4. Serious threat to endangered wildlife.

5. Zero facilities in a safe walking distance.

Yours faithfully

[redacted]

Sent from my Galaxy

19. [redacted] (Mrs)

Address: [redacted], Piddington, [redacted]
Date: 12/09/2026

Mrs A [redacted]

[redacted]

Piddington

[redacted]. 12/09/2026

Dear Sir/Madam

I strongly object to the planning proposal of housing 1256 un documented men on the MOD site A at Piddington.

First and foremost there is a huge safety issue.

Housing that amount of men, free to come and go, at all times directly on to an unlit fast road with absolutely no pathway. It will be an accident waiting to happen. It will be a WHEN it happens scenario rather than IF.

In winter months the FOG down that road can be particularly THICK. Also as it is a rural location ICY stretches always form in patches regardless of whether or not gritting has taken place. The last thing needed is single or groups of people wandering down the road trying to find facilities because Piddington has NONE. Car verses person is never a good outcome.

The sheer amount of males intended is way too disproportionate to the size of the village. Myself and my daughter even my son and husband will not feel safe where we live and that is a very sad way to have to live our lives.

Yours faithfully

[redacted]

20. [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 14 September 2026

Formal Objection to MOD Site A Bicester

Application reference: PCU/RARE/C3105/3378843

[redacted]

[redacted]

Piddington

[redacted]

14 September 2026

Dear Cown Development Caseworker Unit,

I am writing formally to object to the proposed development of MOD site A to become an asylum centre. As a resident of Piddington for the past 11 years and Bicester town a further 11 years prior. This development is completely wrong for the asylum seekers and local residents. The proposal is wholly disproportionate in the scale of occupant's vs population of Piddington, situated on a road with a history of fatal accidents, the site is a MOD storage facility with no mains sewerage, electricity, or water, ecological concerns have not been addressed Quite simply this is the wrong site to accommodate 1256 asylum seekers.

Road Safety

The main entrance to the site is on the [redacted], the speed limit on this road varies between 50-60 mph, three junctions are within a short distance. Long stretches of the road have no pavements and no street lighting. I drive this road every day and most evenings having witnessed many near misses and actual accidents. The road has a bad history of accidents including a fatality in 2024, a fatality at the junction of Bullingdon prison just 100m away. The road is not suitable for pedestrians meaning the only safe means of travel would be vehicles from the site.

Site Power & Facilities

As a resident living in Piddington the frequent loss electricity and water pressure is something you live with, however this proposal increase demand to facilitate housing 1256 men. The nearest wastewater treatment works, Bicester WwTW, continue to serve an ever-growing population and the applicant's own utilities assessment states that "potential headroom may exist but requires confirmation of capacity and permit compliance"

There is no on-site wastewater treatment plant, and the application's own foul drainage strategy is described as provisional pending further survey and stakeholder engagement.- There is no evidence that Thames Water has confirmed, in writing, that the network can accommodate this scale of additional demand.

There is clearly insufficient electrical network capacity The applicant's own

assessment states that the condition, capacity and configuration of the electrical network serving the site are “currently unknown,” and that the capacity of the primary intake “has not been verified” There is no gas supply proposed for the site, meaning heating, hot water and cooking for over a thousand people would depend on this same uncertain electricity supply.

Scale Of Proposed Development

Living in Piddington will change our lives not just for a few months or years but ten or more. The applicant's own Statement of National Importance confirm a capacity of 1,256 bedspaces, all for single adult men is more than four times the entire recorded population of Piddington itself (304 residents), and close to the combined population of Piddington, Upper and Lower Arncott and Blackthorn together. The site's own preliminary Unexploded Ordnance Risk Assessment scopes its work around “accommodation for 3,510 service users” — three times the capacity stated elsewhere in the application — suggesting the eventual scale being planned for may be larger than the figure being presented to residents now.

In conclusion

Not only should this site not go ahead it should not have even been considered given previous history and associated costs. It is simply not the right location to house 1256 adult males with open access, the impact on Piddington would be life changing, the ecological damage will be irreparable. It does not represent value for money.

Yours Faithfully

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

21. [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 14 September 2026

Formal Objection to MOD Site A Bicester

Application reference: PCU/RARE/C3105/3378843

[redacted]

[redacted]

Piddington

[redacted]

14 September 2026

Dear Cown Development Caseworker Unit,

As female resident of Piddington I am writing formally to object to the proposed development of MOD site A to become an asylum centre. The development is completely wrong for the asylum seekers and residents. The proposal to house 1256 male adults is disproportionate in the scale of occupant's vs a population of 350 who reside in Piddington of whom 166 are female and 46 children. The site is not as people are led to believe an ex-army barracks, it is a working storage facility that has no permanent infrastructure to house 1256 asylum seekers. The land and buildings are contaminated with asbestos and old munitions.

Ground conditions

The site history of as ordinance depot means there is a risk of unexploded ordinance contamination. The assessment carried out is a preliminary desk top assessment only, no intrusive ground investigations appear to have been completed before the application was submitted.

The applicants own geo-environment assessment identifies area of the site handling and storing munitions and flags asbestos containing materials as a further risk to ground contamination.

Site Power & Facilities

Living in Piddington you become fully aware of the poor network infrastructure with frequent power outages, and low water pressure This proposal increases demand to facilitate housing 1256 men. The nearest wastewater treatment works, Bicester WwTW, continue to serve an ever-growing population and the applicant's own utilities assessment states that "potential headroom may exist but requires confirmation of capacity and permit compliance".

Ecology and biodiversity

The applicants own ecological assessment states that it cannot be considered comprehensive assessment, and records that a number of protected species surveys remain outstanding. No biodiversity net gain assessment appears to have been produced, despite this being a standard requirement for a development of this kind.

Natural England appears to have been consulted more than once, but the correspondence said to resolve its concerns has not been published.

There is evidence of Great Crested Newts right next to and inside the site despite the government ecological reports there is not.

Independent data search identifies records of protected bats, badgers, otters, despite the applicant's ecological desk study reporting "no records".

Scale Of Proposed Development

Living in Piddington this will change the lives of residents for ten years or more. The applicant's own Statement of National Importance confirm a capacity of 1,256 bedspaces, all for single adult men is more than four times the entire recorded population of Piddington itself (304 residents). The site's own preliminary Unexploded Ordnance Risk Assessment scopes its work around "accommodation for 3,510 service users" — three times the capacity stated elsewhere in the application — suggesting the eventual scale being planned for may be larger than the figure being presented to residents now.

In conclusion

This proposal should not go ahead. It is simply not the right location to house 1256 adult males with open access, the impact on Piddington would be life changing, the ecological damage will be irreparable. It does not represent value for money.

Yours Faithfully

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

22. [redacted]

Address: [redacted], Piddington, Bicester, Oxon, [redacted]
Date: 9 September 2026

Objection to Planning Application reference: PCU/RARE/C3105/3378843

To: Crown Development Casework Unit – crowncasework@communities.gov.uk

Name: [redacted]

Address: [redacted], Piddington, Bicester, Oxon [redacted]

Sent on: 9 September 2026

Please confirm that you have received this and keep me informed of the next steps.

As a longstanding resident of Piddington I wish to object very strongly to this planning application for a centre providing non-detained asylum accommodation for 1,256 single adult men on Site A, MoD Bicester.

I base my objections solely on planning matters, and the concerns I have about what procedures the Home Office has followed.

Quality of application

The 'advance planning' that has been done for such a significant and long-term development on this site seems at best ill-conceived, not fully thought through, and at worst incomplete, inconsistent and designed to obfuscate. As a former editor of complex material, I am horrified by the poor quality of the application submitted by a government department and the lack of care that has been taken over such an important document. In my editing days, such a badly prepared and clearly rushed piece of work, riddled with errors and inconsistencies, would never have made it to this stage.

The actual evidence the application purports to provide in support of its planned development is largely missing or scanty. The applicant's own documentation, included as part of the application, contains admissions across several different areas that the information provided 'cannot be considered a comprehensive assessment' (phrase taken from the Preliminary Ecological Appraisal). The Drainage Design Statement, for example, states that 'no intrusive ground investigation has been undertaken at this stage' and that the position of the drains the accommodation will use 'is currently unknown.' This in Piddington, a village that regularly suffers flooding owing to poor drainage. We have lived in [redacted] for nearly 44 years, so we know that at times of heavy rain the road through the village regularly floods along a significant stretch and prevents traffic flow and movement of residents of several houses until the water subsides. And in the statutory Flood Risk Assessment 'If any new sewers were to be adopted an application would be required to [the relevant service provider] under Section 104 of the Water Industry Act 1991. (Flood Risk Assessment, sections 5.3.1 and 5.4.1.) No one has bothered to replace the placeholder text in square brackets with the actual relevant service provider – Thames Water. Clearly, no one has given the document even a cursory glance to make sure the important bits have been filled in.

In addition to the many instances of missing or redacted information – including that of an essential nature, without which the 'planning' in this application is meaningless – there are several cases where it is evident that material has been cut and pasted from another document, concerning a different site, and again, no one has checked it to pick these things up before submission. The ten instances where the road number that passes Site A is consistently given as a completely different road – one not even in Oxfordshire or Buckinghamshire – are a clue to the slipshod nature of the work. Although the application clearly states that the accommodation is intended to house 1,256 men (already vastly outnumbering our small village of 350), in two places in the Preliminary UXO Risk Assessment it states that it will accommodate 3,510. The garbled sentence containing this figure ('The proposed scheme consists of the work is understood to construction of accommodation for 3,510 service users') is a clear sign it was pasted from a form or template at speed and never reread.

I'm aware that Piddington Parish Council will be preparing its own detailed response to the application and feel confident that it will list many more examples of missing, inconsistent or wrong information contained in it, so I won't supply more here. However, the poor quality of the paperwork – full of mistakes, lacking the most basic information about key aspects and clearly put together in a hurry to comply with a questionable deadline – raises questions about the integrity, and indeed honesty, of this scheme. The document seems designed to obfuscate rather than clarify. As no one from the Government has actually communicated yet with anyone from Piddington about their intentions, we are left to draw our own conclusions from the document as presented.

Utilities

Residents of Piddington have to cope with fairly frequent loss of water supply and power outages, particularly in winter. In the application submitted there is no evidence of confirmed water, power or sewage capacity, or of any contact with Thames Water

Losing our water supply – or the threat of it – has increased markedly in the last year or so. I have a disability and am on Thames Water's priority list, which means they deliver bottled water to me if there is a definite or a possible loss of water supply. This year I've had several batches delivered, which indicates a degree of precariousness with our existing water supply that surely will increase with any additional demand. The application is unclear on how the additional demands made on water use will be met, but the figures given in the application suggest a serious mismatch between water required and water actually available. My disability means that I rely on a wash/dry WC, and so a reliable mains water and power supply is essential for me. I'm concerned that the lack of attention given in the application to planning for these utilities will have a serious impact on my daily life. To treat the sewage, a new on-site wastewater treatment works plus pumping station is proposed, discharging treated effluent to an unidentified watercourse. In Phase 1, the residents will have an interim cesspool with the waste taken away by lorries. The power supply to the site appears to rely on diesel generators – a health hazard not only for the occupants of the asylum centre but also for people living

nearby and the ecology of the site. No risk assessment for any of these things appears to have been done and there are no indications of how risks might be mitigated.
Deciding to base a development of such a size on such a haphazard and reckless ‘plan’ for infrastructure is perverse and wasteful of taxpayers’ money and resources. This is clearly an unsuitable place to put the development, with no existing infrastructure for basic utilities so that everything needs to be brought to the site by various makeshift and unsustainable solutions. It is important to call out this ‘wing and a prayer’ approach because yet another inconsistency in the document is the length of time the site is expected to be in use. The application is for a temporary ten-year use. The various supporting documents, though, say otherwise: ‘Over time however, it is intended that the site will subsequently be expanded for use as a long-term asylum accommodation solution’, that permitted development would not provide ‘the necessary certainty for permanent infrastructure solutions’, with elsewhere ‘there are no definitive plans for the decommissioning phase’, and ‘it is assumed that the Proposed Development operates permanently’. So we go from temporary, through uncertain, to permanent, all in the same application.
History
As previously mentioned, we’ve lived in Piddington for nearly 44 years, and so remember the smaller accommodation centre (capped at 750 people) that was proposed (again for reasons of urgent national need) at this location in the early 2000s. Following a public inquiry, an independent Inspector found the location unsustainable, citing isolation, risk to community cohesion, strain on local services, and pedestrian road safety as reasons for recommending refusal. That earlier scheme was abandoned within about two years as uneconomic, after the national demand used to justify it fell sharply.
The current proposal is for a much larger number of people, at greater scale, all men (rather than the earlier proposal’s mixed population including women and families), with fewer specified facilities and many fewer staff.
The site location’s environment and infrastructure haven’t changed much in the intervening years. So I fail to see why it has been put forward again now as a suitable place for the asylum accommodation centre. It’s clearly unsuitable by every criterion, and nothing in this badly cobbled together application gives me any confidence that going ahead with it will not be a social, ecological and financial disaster.
I’d like to record here, too, my anger at the questionable decision to submit the planning application via the Urgent Crown Development route. By choosing to do this, the Government is closing down pretty much every avenue that allows the people most affected by it even to be consulted let alone to have any effective input into the decision – a choice that is in glaring opposition to PM Andy Burnham’s professed aim to give more decision-making power to the local communities.

23. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: 9 September 2026

Application reference:PCU/RARE/C3105/3378843

To: Crown Development Casework Unit – crowncasework@communities.gov.uk

From: [redacted]

[redacted]

Piddington

Bicester

[redacted]

Objection sent on 9 September 2026

Please confirm that you have received this objection and keep me informed of the next steps

I am writing to object to the proposal to create an Asylum Seeker Centre at MOD Bicester Site A. I have read through the documents with the planning application and am shocked by the lack of detail, the amount of missing evidence and reports from consultees, the amount of contradiction between 'facts' presented in diWerent files, and the amount of redaction. However, as I know that Piddington Parish Council will be submitting a detailed objection I will not repeat their findings here.

I have lived in Piddington since 1982, almost 44 years, so I was here when the previous (2002/03) proposal for an Asylum Centre (Planning Application - 02/01044/GD) was rejected by a Planning Inspector, whose decision was subsequently overruled by Deputy Prime Minister John Prescott. Some of my objections relate back to that plan, and some to the later plan for a Removal Centre on the same site that was approved but never built (Planning Application - 08/02511/F).

Pedestrian safety

I have strong concerns about pedestrian safety on the [redacted]. I have walked along the stretch of road past the proposed site as far as the top of the hill known as Piddington pitches and can confirm that it is extremely hazardous. There are no footpaths other than a short one near the prison. Elsewhere it is very diWicult to avoid traWic - where there are verges, they are very uneven and almost impossible to walk on whether wet and slippery in winter or baked hard and overgrown in summer. In places there are no verges owing to thick bushes. The traWic along this road is very fast moving, with both speed and number of vehicles having increased over the years. The Transport Assessment reports the 85th percentile speeds on the B1104 (I assume it means [redacted]) beside the site as between 48.9 and 53.6 mph, which I think means that 15% of vehicles are driven above that speed. The Planning Inspector for the 2002/03 plan wrote:

'I believe that 750 asylum seekers, of mixed races and backgrounds, accommodated together, … would be very keen to explore their new local surroundings. The Centre,

however well designed, would have an enclosed, formal, controlled character. Even with purposeful activity provided on-site, and with the opportunity to leave the site to visit nearby towns on the proposed minibus, there would still be a very natural desire for asylum seekers to go for walks, visit nearby villages and attractive countryside, such as Muswell Hill.'

I would add that, given how these men have arrived at the UK, they are clearly brave, adventurous and not averse to risk, and as the centre is much larger and deliberately more spartan than the previous proposal with little purposeful activity provided on-site, the desire to get out and explore would be even greater Not only would the roads be unfamiliar to service users, they would most likely have come from countries such as Sudan, Eritrea, Afghanistan and others that drive on the right side of the road, which would lead many to look in the wrong direction for approaching traWic. The fact that there is a 90-day turnover of service users means that there would be a continual influx of people unfamiliar with the dangers.

Recent pedestrian and other accident figures for the road are not very helpful since we would be comparing an area where there is currently very little pedestrian activity (because hardly anyone lives on that road) with a potential population of more than 1250.

Fear of crime and disorder

Although the Secretary of State dismissed the fear of crime and disorder as being suWicient to act against the 2002 plan, his agent did say:

"The Secretary of State agrees that fear of crime can be a material planning consideration and local residents have genuine concerns about the potential for an increase in crime and disorder."

In his report, the Planning Inspector wrote

"Local people are clearly very fearful that the proposed development would lead to an increase in crime and disorder in the locality. That fear is not founded on any scientific evidence that asylum seekers are disproportionately inclined to commit crime or acts of disorder. Nonetheless, that fear would, I recognise, exist and it would cause stress and anxiety for local people."

There is even more fear from local people in this case, but it has nothing to do with asylum seekers being more likely to commit crimes – there may well be no evidence for this. However, there is evidence that the majority of crimes and antisocial behaviour are committed by young men. The individuals who are service users here will have virtually no money, have no meaningful occupation or other purposeful activity, and will be living with 1200 other young men in a camp designed to have only basic facilities. This is in a place where there are at present no people. Of course there will be the potential for

increased crime in the area accompanied by a realistic increase of stress and anxiety, much more so than in the previous application.

Sta2ing levels

According to the planning application for a Removal Centre (2008/09), the planned centre was expected to have 528 full-time equivalent staW for a population of 800 single male inhabitants. The current application form has number of employees redacted, although elsewhere, in the Drainage Design Statement, a staWing level of 130 staW is mentioned for 1256 service users. The same number is implied in the Transport Assessment, which recommends 7 cycle spaces at the rate of one per 20 staW (which corresponds to between 120 and 140 staW). It is very concerning for the safety of both the local community and the service users that there is such a vast reduction in staW proposed for a much larger population of service users – both schemes are classified as 'Secure Residential Units' so are clearly similar in nature.

National importance, urgency and community tensions

One of the reasons given for urgency (in the Statement of National Importance) is that the use of hotel accommodation is being phased out, the reason being given as:

"the prolonged use of hotels has placed a strain on local communities, becoming a flashpoint for community tensions, leading to an increase in protests and violence."

First, it is a political decision to phase out hotels rather than a case of an urgent national emergency. Second, the use of large accommodation centres is also a cause of protests and community tension. As the Home OWice says in its Equality Impact Assessment:

"The Home OPice recognises the decision to consider Bicester for asylum accommodation could lead to protests, and that these may continue through the life of the site. There is potential for protests externally from four keygroups:

1. Local residents and politicians who object to the usage of the site for accommodation of asylum seekers.
2. Pro-immigration groups who have concerns about the perceived conditions on the site, or that the site is being operated as a detention centre.
3. Anti-immigration groups objecting to the housing of asylum seekers or their arrival in the UK.
4. Individuals/groups who may view/use the site as a focal point for demonstrations/protests in support/against events occurring outside the UK and/or in relation to UK Foreign Policy"

The Statement of National Importance also gives another reason for phasing out hotel use:

"It is also understood that hotels represent a 'pull' factor for asylum seekers to come to the UK even after passing through other safe countries: intelligence suggests that the

prospect of a paid-for hotel bed is used to lure asylum seekers into small boats11."
There is no evidence given for this claim (the footnote just refers to another Home OWice document that makes the same unsubstantiated claim). However, even if it is true, the people smugglers will surely just change the lure to being a bed and three meals a day in holiday camp style accommodation (the description that has already been used by councillors in Essex talking to the media).

Nettlefire

Many of the reports and assessments accompanying this application are from an organisation called Nettlefire, who are apparently experts in fire risk, air quality, drainage design, geo-environmental and geotechnical assessment, and utilities and infrastructure. For a normal planning application, I would expect such reports to be commissioned from independent experts in their field, but Nettlefire doesn't appear to exist outside the Home OWice's current application, which makes me think the Home OWice is doing its own reports. This introduces a strong suspicion that the Home OWice is manipulating the system to get the results it wants – it is marking its own homework.

24. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: not stated

Dear Sir/Madam,

Re: Urgent Crown Development Application – MOD Bicester (Site A)

I am writing to formally submit my objection to the Urgent Crown Development application for the proposed asylum accommodation centre at MOD Bicester (Site A).

I strongly object to this development on the grounds of severe conflict with active defense infrastructure, the unacceptable loss of strategic Ministry of Defence (MOD) surge capacity, and profound procedural failures, data contradictions, and unmitigated safety and environmental risks within the application itself.

I urge the Secretary of State to refuse the application based on the following material considerations:

Incomplete Application and Missing Material Risk Assessments: The fast-tracked nature of this submission has resulted in an incomplete planning file. The application entirely lacks transparent, comprehensive Community Safety Risk Assessments and detailed local highway capacity risk models. Furthermore, independent reviews have highlighted major gaps and flaws in the published ecological and environmental assessments. A decision of this national magnitude cannot legally or safely be determined on partial or absent risk data.

Severe Inconsistencies and Anomalies in Resident Capacity: The application introduces data anomalies that severely compromise its legitimacy. While the main planning statement seeks permission for 1,256 service users, critical internal technical documentation—specifically the site's Unexploded Ordnance (UXO) risk assessment—reveals that the operational safety footprint was evaluated against a capacity of 3,510 residents. This threefold discrepancy makes it impossible to accurately calculate the true risk and impact on water, sewage, local healthcare, and emergency services.

Factual Inaccuracy Regarding Baseline Site Activity: The application incorrectly states that Site A is "unused" or "no longer in active use". While the indoor warehouses have no current utilisation, the extensive external hardstanding footprint is an active operational asset. Basing a fast-track planning decision on an incorrect baseline assessment of active land use undermines the legal validity of the submission.

Massive Displacement of Strategic Materiel: Because the site is actively utilized, facilitating this development requires the immediate, highly disruptive removal of an estimated 900 lorry loads of large, non-palletised military emergency kit currently staged on the hardstanding. The transport burden of clearing this area has been completely omitted from the applicant's traffic and environmental figures.

Compounding Strain on a Consolidated Defence Estate: Displacing 900 lorry loads of equipment ignores the reality of a modern, streamlined MOD logistical network that relies heavily on key primary hubs like the MOD Donnington and Longtown facilities. Forcing Bicester's active storage inventory into these already lean facilities compromises strategic national readiness.

Severe Adverse Impact on Community Cohesion and Rural Balance: The proposed scale of the facility completely dominates the nearby rural settlements. Introducing a transient population of this magnitude next to small villages like Piddington entirely overwhelms the local demographic baseline. This creates an unsustainable spatial imbalance that undermines community cohesion. This directly mirrors the findings of the 2003 Planning Inspector's report, which formally rejected an identical proposal on this exact site due to its isolation and severe social cohesion risks.

Severe Environmental, Acoustic, and Fire Risks from Temporary Utilities: The applicant's reliance on heavy-duty diesel generators to overcome the site's insufficient grid power supply introduces unacceptable environmental and safety impacts. Operating industrial generators continuously creates constant acoustic pollution and significant particulate emissions, severely degrading air quality in this rural setting. Furthermore, the massive on-site bulk fuel storage required to run these generators introduces a major fire and hazardous installation risk that has not been adequately assessed or reconciled with the capacity of local emergency services.

Excessive Redaction Undermining Public Examination: The level of redaction across the published consultation documents is excessive and goes far beyond necessary security protocols. Crucial operational data, environmental impact figures, and third-party reporter details have been blanked out. This extreme lack of transparency prevents local authorities, statutory consultees, and the public from executing their democratic right to properly scrutinize the proposals.

The combination of heavily redacted documents, missing risk assessments, temporary power emissions and fire hazards, a chaotic data conflict between 1,256 and 3,510 residents, and the unmitigated displacement of 900 lorry loads of strategic defense kit means this application fails to meet basic planning and administrative standards. I urge the Secretary of State to refuse this application.

Yours faithfully,

[redacted]

[redacted]

Piddington

Bicester

[redacted]

Sent from my iPad

25. [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 13th September 2026

FORMAL OBJECTION - MOD BICESTER SITE A

Application Reference : PCU/RARE/C3105/3378843

[redacted]
[redacted]
Piddington
Oxfordshire
[redacted]

Date 13th September 2026

Dear Crown Development Casework Unit,

I am writing to formally object to the proposal to use the MOD site at Piddington to house approximately 1,250 male asylum seekers.

My objection is entirely about the overwhelming scale of this project, it has nothing to do with the background of the people moving in, but everything to do with the fact that our tiny quiet village simply cope with an influx of this size.

I am a 71-year-old resident and have lived in Piddington for the last 24 years, I have come to know this area inside and out. Piddington has only 350 residents, quadrupling our population overnight is not a modest adjustment, it will completely rewrite the character of our rural community.

Please consider the following critical issues before making a decision.

1. Complete lack of infrastructure:

We have no village shop, no pub, no postoffice, or medical facilities new residents will be entirely isolated which is detrimental to their wellbeing.

2. Dangerous road conditions:

Our rural roads completely lack proper pavements and overnight street lighting, having walked these lanes for decades, I know first-hand how treacherous these can be, so expecting people to walk along unlit, narrow country roads to reach Piddington and neighbouring villages is a serious accident waiting to happen.

3. Overwhelmed public services:

The planning document claims that the site will be "self-sufficient," but how this is actually going to happen is a total mystery to me. There are already not enough GP's or dentists around to cover the existing local population as it is. Where they expect to suddenly find the medical staff and resources to look after an extra 1,250 people is beyond comprehension. It will break an already stretched system, effecting healthcare and safety for everyone in the wider area.

4. Construction safety and regulatory compliance:

As someone who has worked in the construction industry for over 40 years, I am acutely aware of the statutory obligations required for large scale redevelopments. Before, any physical breaking of ground occurs or modular

units are delivered, there must be all verification that all CDM 2015 regulations, necessary health and safety documentation, environmental impact mitigations logs, and formal construction procurement frameworks have been

fully executed and made completely accessible on the planning portal. Temporary or urgent crown development

clauses must not be used as a mechanism to circumvent standard construction compliance. Everything must be done

strictly by the book, as these legal papers must be completely visible to the public first.

The A site is not suitable just because it has empty buildings, a proper home requires infrastructure, transport, healthcare, and safe walkways.

Therefore, before this goes any further, I request that the authorities publish independent, thorough assessments on the traffic impact, pedestrian safety, health care capacity and utility strain this will cause.

I ask you to please reconsider this proposal and find a more suitable urban location that actually possesses the infrastructure required to support these individuals properly.

Please keep me fully informed of next steps.

Yours faithfully,

[redacted]

26. [redacted] (Mrs)

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 13th September 2026

FORMAL OBJECTION - MOD BICESTER SITE A

Application Reference : PCU/RARE/C3105/3378843

Mrs [redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

Date 13th September 2026

Dear Crown Development Casework Unit,

I am writing to you as a resident of Piddington to urgently express my deep concerns, and object to the proposed development at the MOD

Bicester Site A.

I would like to make it clear that my objection is to the scale of the proposed development and whether its suitability has actually been demonstrated.

It is not an objection to people seeking asylum.

As a woman living in this village for over 23 years safely, this proposal has completely eroded my sense of personal safety. I regularly participate

in community care, such as litter picking, but this sheer scale of this influx of having 1,250 male asylum seekers creates a severe, unsustainable

imbalance. This means I will no longer feel safe walking at Widnell Lane, adjacent to the A- site, I will feel imprisoned in my own village, my safety

security and freedom will be under threat!

Therefore, leaves me with questions that I don’t think have been answered.

1. Accessibility and Road Safety

This is a big concern for me, as I use these roads on a daily basis, the roads surrounding the site are rural and with no pavement's, and in the

village itself we have very few street lights, I would not personally consider walking along parts of these roads, particularly at night. The other

concern is the Thame Road, I drive on this road on a regular basis, therefore, have lots of experience of driving on this road, its a fast rural road and long

stretches without a pavement or street lighting. The proposed mini bus service doesn't remove the need to properly assess pedestrian safety.

A transport strategy cannot guarantee that every journey from a residential development will be made by minibus. Surely, the decision maker

would need to look into this much further and be totally satisfied for pedestrian safety, especially if journeys are made on foot.

2. Public Transport & Isolation

The rural nature of our area means there is little, to no public transport an odd bus goes through the village.

New arrivals will be isolated, with hardly any recreation, which leads to danger and safety on narrow rural

roads or making their way to our Jubilee Park that runs literally along the A site, what security measures are going to

be in place to guarantee the safety and protect us women and children, we will no longer feel safe!

3. Flooding & Drainage

There are so many unknown entities within the proposal such as flooding and drainage concerns, wastewater

and electricity concerns, with no solution to a permanent solution, the applicants assessment for the electric supply

even states that the current capacity is unknown and that generators would need to be relied on to meet the demand,

this would, of course, mean diesel would be required to power these adding pollution and noise creation.

What measures have you got in place regarding the environmental pollution, degrading ecosystem health?

While I understand the Home Office faces national challenges regarding the asylum accommodation, overwhelming

a tiny, vulnerable community is not a viable or humane solution for neither the residents or the individuals being accommodated.

I urge the Home Office to immediately reconsider this plan and engage in transparent, realistic dialogue with our local parish council

and residents. I therefore, respectfully ask the Secretary of State not to grant planning permission.

I look forward to your urgent response, please confirm and acknowledge that you have received this.

Yours faithfully,

[redacted]

27. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: not stated

I am writing to formally object to the proposal to use the MOD site at Piddington to accommodate approximately 1,250 migrants.

My objection is not based on the nationality, ethnicity or immigration status of the individuals who may ultimately be accommodated at the site. Rather, it concerns the exceptional scale of the proposed accommodation in relation to the existing size, infrastructure, facilities and capacity of Piddington and the surrounding rural communities.

It is also concerning that the documents released to the public on the .GOV website appear to have inaccurasies such as ,

3500 capacity rather than 1250. And road surveys listed for the wrong road. If mistakes are made on important documents released to the public it does not inspire public confidence.

I am scared of what may happen with over 1000 men who are undocumented and appear to have entered the country illegally with no documentation being allowed to free roam in the area which includes the village of Piddington.

I am scared for myself.

I am scared for my family, wife , daughters and grandchildren when they visit.

I am scared for the residents of Piddington.

I am even scared for the potential "service users" of this facility. What checks have been done on their mental health ? Very little I would imagine if they have no documented history. What will they do during the day when the local workers are at work ?

Having only recently moved into the area I object to Andy Burnhams flippant remark when answering a question on this matter that " the more affluent areas have to take their share "

How is Piddington affluent ? Most of the houses would likely be worth less than a 3 bedroomed ex council house in Slough from where we just moved from.

What would be a fair share ? Not 4x the existing population.

My experience of Piddington population would be that it is a mix of young families , workers and retirees. Not an area which has the capability to cater for such an influx of young bored men .

1. Disproportionate scale

Piddington is a very small rural community with approximately 315 residents. The proposed accommodation of approximately 1,250 additional people would therefore represent an increase equivalent to almost four times the existing population.

The resulting population would be approximately 1,565 people, meaning that the existing community would be required to absorb a population almost five times its current size.

This is not a modest increase in population. It represents a fundamental change to the scale and character of the settlement and surrounding area.

It is therefore essential that the suitability of the proposal is considered in terms of its proportionality and impact upon the existing community and local infrastructure, rather than simply whether the physical MOD buildings are capable of containing the proposed number of people.

2. Lack of local facilities

Piddington does not have the facilities that would ordinarily be expected to support a population of this size.

There is no village shop, no public house or comparable local facility providing residents with everyday access to basic goods and services.

Consequently, a substantial number of the proposed residents would inevitably need to travel outside Piddington for basic necessities, healthcare, shopping, recreation and other services.

This raises significant questions regarding:

* the availability and capacity of public transport;

* traffic generation;

* pedestrian safety;

* access to healthcare;

* pressure upon neighbouring communities and their facilities;

* access to shops and essential services;

* the capacity of local public services; and

* the ability of the surrounding area to accommodate such a substantial additional population.

The proposal should therefore not be assessed solely on the basis of the site itself. Its impact upon neighbouring villages and the wider local area must also be properly considered.

3. Absence of pavements and pedestrian infrastructure

One of the most significant concerns is the lack of adequate pedestrian infrastructure within the village and surrounding roads.

Piddington is a rural settlement and does not have a comprehensive network of pavements capable of accommodating large numbers of pedestrians.

If 1,250 additional residents are placed at the site, there will inevitably be substantially more pedestrian movement between the site, public transport, neighbouring settlements and local facilities.

This creates legitimate concerns regarding highway and pedestrian safety, particularly where people are required to walk alongside rural roads without pavements.

A detailed and independent assessment should therefore establish:

* anticipated pedestrian movements;

* the routes likely to be used;

* the adequacy of existing footways;

* road crossing requirements;

* traffic speeds;

* visibility;

* accident risks;

* public transport access; and

* whether additional pedestrian infrastructure is required.

4. Inadequate street lighting

There is a further concern regarding street lighting, particularly where lighting is switched off overnight.

The combination of a large additional population, rural roads, limited pedestrian infrastructure and inadequate overnight lighting creates a legitimate road and pedestrian safety concern.

It would be unreasonable to expect significant numbers of people to walk through an unlit rural environment without first establishing that the routes are safe and suitable.

The relevant authorities should therefore provide evidence of a specific night-time pedestrian and highway safety assessment undertaken in light of the proposed accommodation.

5. Pressure upon healthcare and public services

An additional population of approximately 1,250 people would inevitably create additional demand for local services.

Questions must therefore be answered regarding the capacity of:

* GP surgeries;

* dentists;

* pharmacies;

* hospitals;

* ambulance services;

* mental health and welfare services;

* police;

* fire and rescue services; and

* other relevant public services.

It should not simply be assumed that existing services have sufficient capacity.

The proposal should be accompanied by clear evidence that the relevant service providers have been consulted and that the additional demand has been assessed and appropriately resourced.

6. Emergency services and access

The rural nature of Piddington also raises concerns about emergency access.

The authorities should demonstrate that the increased population can be adequately served by emergency services and that there are appropriate arrangements for:

* emergency vehicle access;

* evacuation;

* fire safety;

* medical emergencies;

* policing;

* safeguarding; and

* emergency communications.

The potential increase in demand should be assessed against the existing capacity of the relevant services rather than considered in isolation.

7. Impact on neighbouring communities

Because Piddington has very limited local facilities, many of the proposed residents will necessarily use facilities in neighbouring communities.

The proposal could therefore place additional pressure on nearby:

* shops;

* supermarkets;

* GP surgeries;

* dentists;

* pharmacies;

* bus services;

* railway stations;

* roads;

* public spaces; and

* emergency services.

It is therefore important that the assessment considers the cumulative impact across the wider area, rather than restricting consideration to the physical boundary of the MOD site.

8. Community cohesion and the character of the village

The introduction of a population almost four times the size of the existing community cannot reasonably be regarded as having no effect upon the character and functioning of the village.

Piddington has developed as a small rural community. Introducing a population of approximately 1,250 people would fundamentally alter the demographic and physical scale of the settlement.

This does not mean that the existing community is unwilling to welcome newcomers. Rather, it recognises that successful integration and community cohesion require appropriate scale, facilities, transport, services and resources.

A proposal of this magnitude requires a clear plan demonstrating how community cohesion will be supported and how both existing residents and new residents will be able to access appropriate services and facilities.

9. Suitability of the site

The fundamental question should be whether this is an appropriate location for accommodation on this scale.

The fact that the MOD site may contain buildings capable of being converted into accommodation does not, in itself, demonstrate that the location is suitable for 1,250 residents. It appears that the buildings are not suitable

The suitability assessment should consider the whole environment in which the residents will live, including transport, healthcare, pedestrian infrastructure, lighting, shops, emergency services, recreation, access to support services and the impact upon surrounding communities.

A site which is physically capable of accommodating people is not necessarily a site which is socially, environmentally or infrastructurally suitable for accommodating them at this scale.

10. Request for full evidence and assessments

Before any decision is made, I would ask that the relevant authorities publish or make available the evidence and assessments underpinning the decision to identify Piddington as a suitable location.

In particular, I request evidence addressing:

1. Highway and traffic impact;

2. Pedestrian and road safety;

3. Night-time pedestrian safety;

4. Public transport capacity;

5. Healthcare capacity;

6. Police and emergency service capacity;

7. Fire safety and emergency evacuation;

8. Safeguarding;

9. Waste and refuse management;

10. Water, sewage and other utilities;

11. Environmental impact; It appears diesel generators are to be used to supply electricity.

12. Community cohesion;

13. Impact upon neighbouring settlements;

14. The cumulative impact of the proposed population increase; and

15. Why a site accommodating approximately 1,250 people has been considered proportionate and appropriate for a community of approximately 315 existing residents.

Conclusion

I respectfully request that the proposal is reconsidered and refused, or that an alternative and more proportionate location is identified.

The issue is not whether migrants should receive appropriate accommodation. They should.

The issue is whether it is reasonable or sustainable to place approximately 1,250 additional people in a small rural community of approximately 315 residents which has no shop, no public house, limited local facilities, inadequate pedestrian infrastructure and limited overnight street lighting.

Such a substantial population increase requires substantially more than suitable buildings. It requires appropriate infrastructure, transport, healthcare, emergency provision, pedestrian safety measures, public services and a realistic strategy for supporting both the existing community and those being accommodated.

In the absence of compelling evidence demonstrating that these matters have been properly assessed and adequately addressed, I believe there are serious grounds to conclude that the proposed site is unsuitable for accommodation on the scale proposed.

I therefore respectfully ask that this objection is formally recorded and fully considered before any decision is made.

Yours Faithfully

[redacted] / [redacted]

[redacted]

Piddington

Bicester

[redacted]

28. [redacted]

Address: [redacted], Piddington, Bicester, Oxfordshire, [redacted]
Date: not stated

Dear Secretary of State

We are writing as members of the public who live in Piddington which is close by to Site A and object to the planning application.

We are extremely concerned that the planning application has not properly taken account of the position of the entrance of Site A on the Thame Road road.

There is a warning sign on the Thame Road road warning drivers to take extra care saying that there have been 57 casualties in three years including six motorcyclists. There are no speed cameras on the Thame Road. Although the Bicester to [redacted] is only a B classified road, it is an extremely busy road with no pavement and particularly unsafe for anyone walking along it, especially exiting the Site A entrance. It is also a well known Bikers Road due to its long sweeping bends. This will make it extremely unsafe for people walking out from Site A and put themselves and drivers at great risk.

We are also concerned that the correct level of ecology reports have not been carried out as there are a large variety of Red listed Bats and birds which roost at the site and the proposed development of the site will harm their existence.

We therefore respectfully request that planning permission be refused.

Yours faithfully

[redacted]

[redacted]

Piddington

Bicester

Oxfordshire

[redacted]

29. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]
Date: 14/09/2026

Dear Sir/ Madam

Application reference : PCU/RARE/C3105/3378843

Date : 14/09/2026

I am writing to formally object to the proposed use of the MOD site at Piddington for asylum accommodation.

Piddington is a rural location with no pavement to and from the site. The site is situated on the Thame Road which is not safely walkable with a speed limit of 50MPH although the documentation shows discrepancies in relation to this figure. I would not walk this road and would be very concerned for anyone who did. There is potential for 1256 persons wanting to do this, what risk assessments and measures are in place to protect them and other road users from disaster. The road is unlit with poor visibility of oncoming traffic. Simply pointing out the dangers is not enough, there is no collision search and no safety assessment anywhere in the Transport Assessment. The surveys outlines in the application cover a road in Essex.

The site is approximately 5 miles from the nearest town, if residents were to leave the site on foot Piddington is the nearest village on foot. There are no services, no shop and no pub.

At the edge of the village is our green space which I use to exercise and walk my 2 dogs. Working for the emergency services I find it imperative for my mental health due to the stresses of the role to be able to do this. Shift work means that times I do this can vary and in winter this is often in the dark. I do not see in your initial documentation any risk assessment or mitigation measures which apply to the safety of local residents, especially women and children.

I cannot see from the documentation that the capacity for the emergency services has been assessed to be able to accommodate this site. The LCU for Thames Valley Police means officers cover Witney, Banbury & Bicester. Wait times for the ambulance service often exceed 3 hours. With the extra demand this site may create I cannot see assessments/measures have been put in place to confirm the demand will be met.

Piddington floods, at times the road at the front of our property floods for considerable periods of time due to ditches and streams not being able to keep up and the capacity of the River Ray. From the documentation you have provided you have admitted the planned site floods. I also cannot see that the pollution levels in the River Ray have been taken into account, I note that in 2025 Thames water polluted this river 23 times, lasting 287 hours and this runs along the boundary and the lowest point of the site. There is also no assessment of the additional surface water the site will create, where this will drain to and how this will affect the local area, road, residents and wildlife.

The site's own ecological assessment states that it cannot be considered a comprehensive assessment, and records that a number of protected species surveys remain outstanding. There are records of various rare and protected species on the site. To be able to carry out any work on our property we had to spend a considerable length of time and money making sure these surveys had been completed before our application was able to be submitted, why should this application be any different?

Approximately 6 years ago we lost our home due to compulsory purchase from another government scheme hence moving to Piddington. Before that scheme was able to start there were, as well as others noise and wildlife surveys. There has been records of various protected and endangered species in the proposed site but there from your documentation no thorough surveys have been done and no mitigation measures outlined with regards to protection and mitigation. Additionally, I cannot see reference that noise base levels have been monitored at local properties and expected noise production levels provided from the proposed site from service users, running of the site generators etc and additional traffic the site will produce.

Lastly but most importantly if the safety of our family and neighbouring families cannot be unequivocally guaranteed by the change of use of this site from MOD storage to Asylum centre the application should be immediately scrapped.

On this basis I strongly suggest the application is refused, detailed assessments need to have been carried out to ensure the safety and impact on potential users of the site, local residents and environment.

Yours sincerely

[redacted]

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

30. [redacted]

Address: [redacted], Piddington, Bicester, Oxfordshire, [redacted]
Date: not stated

Dear Secretary of State,

Re: Planning Application PCU/RARE/C3105/3378843 – MOD Bicester Site A, Bicester Garrison, Launton Road, Oxfordshire, [redacted]

I am writing to formally object to the above planning application on environmental and ecological grounds.

My principal concern is that the scale and nature of the proposed development could have significant impacts on protected species, habitats, biodiversity, drainage and the wider environment. I am particularly concerned about the potential effects on bats and Great Crested Newts, and whether the ecological information currently available is sufficiently comprehensive to enable the application to be properly assessed.

Protected species – bats

The proposed development involves demolition, alterations to existing structures, construction of new accommodation and infrastructure, increased human activity, external lighting, roads and landscaping.

These activities have the potential to affect bats and their habitats.

Bats and their roosts are legally protected, and the ecological assessment should therefore establish whether any buildings, structures or trees within or immediately surrounding the development area have potential to support bat roosts.

I ask that the decision-maker establishes that appropriate and sufficiently comprehensive bat surveys have been undertaken, at suitable times of year and using appropriate survey methodologies.

The assessment should not be limited simply to identifying occupied roosts. It should also consider: potential roosting features within existing buildings and structures; trees with potential roost features; bat foraging areas; commuting routes; hedgerows, woodland edges and other linear features; the effects of vegetation removal; the effects of construction activity; and the long-term effects of increased artificial lighting.

I am particularly concerned about light pollution. The introduction of security lighting, accommodation lighting, roads, parking and other illuminated infrastructure could significantly alter the existing night-time environment.

Artificial light can affect bat behaviour and can effectively sever otherwise suitable commuting and foraging routes.

Any lighting strategy should therefore demonstrate that dark corridors and important ecological features will be retained and protected. Lighting should be carefully controlled in terms of intensity, direction, timing and light spill, with sensitive areas kept dark wherever practicable.

Great Crested Newts

I also have significant concerns regarding the potential impact on Great Crested Newts (Triturus cristatus).

The ecological assessment should consider not only ponds located within the application site but also ponds and suitable terrestrial habitat in the surrounding area.

Great Crested Newts can use terrestrial habitat away from breeding ponds, including grassland, scrub, hedgerows, woodland edges, refuges and other suitable habitat. Consequently, simply identifying whether a breeding population is present within an individual pond would not, in itself, adequately establish the potential ecological impact of this development.

The Secretary of State and decision-maker should be satisfied that appropriate surveys have been undertaken for all potentially relevant ponds and terrestrial habitats within the appropriate survey area.

The assessment should consider: potential breeding ponds; terrestrial habitat surrounding ponds; movement routes between ponds and terrestrial habitat; hedgerows, grassland, scrub and woodland; potential impacts from demolition and construction; excavation and ground disturbance; drainage works; vegetation clearance; changes to land management; artificial lighting; and increased human and vehicle activity.

If suitable habitat or populations of Great Crested Newts are present, appropriate avoidance, mitigation and compensation measures must be demonstrated before permission is granted.

Ecological connectivity

I am concerned that the proposed development could cause habitat fragmentation.

The ecological value of the site should not be considered solely in terms of individual ponds, trees or areas of vegetation. These features can form part of a wider ecological network used by bats, Great Crested Newts and other species.

The proposal should therefore demonstrate how ecological connectivity will be retained throughout the site and between the site and surrounding habitats.

This is particularly important where new roads, parking, buildings, security infrastructure, lighting and hardstanding are proposed.

Adequacy of ecological information

I am concerned that the application should not be determined where significant ecological uncertainties remain.

Where surveys are incomplete, outdated or unable to provide a comprehensive assessment of protected species, the appropriate response should be to obtain the necessary information before determination rather than assume that protected species will not be affected.

Given the scale of the proposal and the extent of proposed demolition, construction and infrastructure works, I consider that a precautionary approach is particularly important.

Biodiversity

The proposal should demonstrate a genuine and measurable biodiversity improvement and should not simply compensate for ecological damage after it has occurred.

Any claimed biodiversity net gain should be supported by transparent calculations, realistic baseline assessments and a long-term management and monitoring strategy.

Established habitats should not be treated as readily replaceable simply because new planting or habitat creation is proposed elsewhere.

Drainage and water environment

I am also concerned about the proposed wastewater treatment infrastructure and the potential implications for the local water environment.

The application should demonstrate that wastewater and surface-water systems have sufficient capacity and that there will be no unacceptable effects on groundwater, watercourses, ponds or other habitats.

This is particularly relevant to Great Crested Newts and other species that may depend upon aquatic and wetland habitats.

Surface-water management should incorporate appropriate sustainable drainage measures and should ensure that development does not increase flood risk or adversely affect surrounding land.

Cumulative environmental impact

The environmental consequences of this proposal should be considered in combination with other development and infrastructure pressures in the Bicester area.

The cumulative effects of additional buildings, roads, lighting, vehicle movements, drainage infrastructure and increased occupation could place additional pressure on local habitats and ecological networks.

The fact that the proposed use is temporary should not be treated as meaning that its environmental impacts are insignificant. A ten-year period is sufficiently long for substantial ecological consequences to arise.

Request to the Secretary of State

For these reasons, I respectfully ask that the Secretary of State refuse planning permission unless and until the environmental and ecological issues have been fully investigated and satisfactorily addressed.

In particular, I ask that the decision-maker ensures: 1. Comprehensive and appropriately timed bat surveys have been undertaken; 2. All buildings, structures and trees with potential bat-roosting

features have been assessed; 3. Bat commuting and foraging routes are identified and protected; 4. Appropriate Great Crested Newt surveys have been undertaken for relevant ponds and terrestrial habitats; 5. The wider terrestrial habitat used by Great Crested Newts has been properly considered; 6. Ecological connectivity between ponds, vegetation and other habitats is retained; 7. Artificial lighting is designed to avoid harm to bats and other nocturnal wildlife; 8. The proposed drainage and wastewater arrangements do not adversely affect aquatic habitats; 9. Biodiversity impacts and biodiversity net gain have been properly assessed; and 10. Any outstanding ecological surveys or assessments are completed and independently scrutinised before the application is determined.

I believe that granting permission without resolving these matters would risk causing unacceptable and potentially irreversible harm to protected species and local biodiversity.

I therefore respectfully request that my objection is taken fully into account in determining application PCU/RARE/C3105/3378843.

Yours faithfully,

[redacted]

[redacted]

Piddington

Bicester

Oxfordshire

[redacted]

31. [redacted] (Mrs)

Address: [redacted], [redacted], Piddington, [redacted]
Date: not stated

To: The Secretary of State / Crown Casework

Re: Planning Application PCU/RARE/C3105/3378843 – MOD Bicester Site A, Bicester Garrison

Dear Secretary of State,

I wish to submit a further formal objection to planning application PCU/RARE/C3105/3378843, with particular concern regarding the proposed use of large-scale diesel generators, the resulting air emissions, and the potential implications for human health, including for people who suffer from asthma and other respiratory conditions.

I also have serious concerns regarding flood risk and the potential interaction between flooding, diesel fuel storage and the local water environment.

Diesel generators and respiratory health

As an asthmatic and someone who has had lung surgery in 2010 and suffered pneumonia two years ago, I know that air pollution can worsen respiratory conditions.

I am, therefore, concerned that the introduction of substantial diesel mega-generators close to my home in Piddington could create an avoidable environmental-health risk to everyone living, working or spending leisure time in the surrounding area such as at the Jubilee Reserve in Piddington (which is directly adjacent to the proposed site) or at Launton FC playing field (which is directly opposite the main entrance to the proposed site).

Diesel combustion produces pollutants including nitrogen oxides and fine particulate matter. These pollutants are of particular concern where people with respiratory conditions such as asthma may be exposed.

The applicant should therefore provide a robust, site-specific assessment of the anticipated emissions from the proposed generators, including their number, size, location, operating hours, fuel consumption and exhaust arrangements.

Moreover, as someone who has recently installed solar panels and an air source heat pump in my home in pursuit of clean energy, I strongly believe that the proposal should demonstrate that reasonable alternatives to diesel generation have been properly investigated, including grid connection, battery storage, renewable energy and other lower-emission technologies.

Cumulative air pollution

The assessment should consider generator emissions together with emissions from additional traffic, deliveries, servicing and other activities generated by the development.

I request that the decision-maker obtains sufficient evidence to establish that the combined effect will not result in unacceptable deterioration of local air quality.

Flood risk, diesel pollution and Upper Ray Meadows

I am concerned about the relationship between the proposed diesel infrastructure and flood risk on the wider Upper Ray Meadows floodplain which the proposed site shares a direct boundary.

Upper Ray Meadows is a substantial wetland and floodplain landscape managed by the Berks, Bucks and Oxon Wildlife Trust (BBOWT). It is a patchwork of wet meadows on the Upper River Ray floodplain, with ponds, scrapes and ditches created specifically to retain water and support biodiversity. It is designated as a County Wildlife Site and SSSI.

If generators, fuel tanks or associated electrical infrastructure are located in this area which is vulnerable to surface-water flooding, a flood event could cause loss of power, damage to equipment and potentially release diesel or other pollutants into ponds or watercourses.

The ecological significance of the wider catchment, therefore, makes it essential that the development does not alter hydrology or introduce pollutants into downstream watercourses and

wetlands by demonstrating that fuel-storage and generator infrastructure is appropriately located and protected against foreseeable flood events.

Great Crested Newts

This is particularly concerning in relation to Great Crested Newts.

BBOWT have created new, freshwater ponds within Upper Ray Meadows to benefit Great Crested Newts as they are prevalent in the surrounding area due to the existence of natural ponds. In my own garden, I have had the pleasure of spotting one Great Crested Newt hiding behind my wheelie bin and one hiding in a crack in a step in my back garden. My next-door neighbour, before having an extension built, had to obtain a 'Newt Licence' because of the presence of Great Crested Newts and their proximity to one of the natural ponds.

There is, therefore, a clear ecological reason why changes to drainage and water quality require careful consideration and the applicant should demonstrate, with appropriate hydrological and water-quality evidence, that this development cannot result in adverse ecological effects.

Conclusion

I respectfully request that permission is not granted unless the applicant can demonstrate that:

1. the need for large-scale diesel generation has been properly justified;
2. lower-carbon and lower-emission alternatives have been fully investigated;
3. generator emissions have been quantitatively assessed;
4. cumulative impacts on local air quality have been considered;
5. particular consideration has been given to vulnerable people, including those with asthma and other respiratory conditions;
6. generator exhausts will not create unacceptable exposure at occupied buildings or other sensitive receptors;
7. generator operation will be minimised wherever practicable;
8. fuel storage is secure against flooding and accidental release; and
9. the development will not increase flood risk or create an unacceptable risk of diesel contamination during flooding.
10. Assessment of potential effects upon the Upper Ray Meadows floodplain and associated wetland habitats;
11. Assessment of pollution pathways to ponds and ditches supporting Great Crested Newts;

The combination of; large-scale diesel generation, air pollution and the potential exposure of people with respiratory conditions, fuel storage and flood risk and potential risk to the wider River Ray floodplain containing nationally and locally important wetland habitats and known Great Crested Newt habitat warrants particularly careful scrutiny.

I therefore ask that this objection is formally recorded and given full consideration when planning application PCU/RARE/C3105/3378843 is determined.

Yours faithfully,

Mrs [redacted]

[redacted],

[redacted]

Piddington

[redacted]

32. [redacted]

Address: [redacted], Piddington, [redacted]
Date: not stated

I would like to object to this proposal in the strongest possible terms for the following reasons.

Lack of Utilities & Infrastructure

The site does not have, and cannot be provided with, the necessary services of water drainage and power without either a massive negative impact on the existing local infrastructure or totally uneconomic upgrades to that infrastructure. Given that this application is for a temporary change of use, such massive expenditure is very hard to justify in the current fiscal climate.

The Utilities and Infrastructure Assessment states that the electrical network's "condition, capacity and configuration … are currently unknown" and that "the capacity of the primary intake … has not been verified at this stage". It recommends on-site power generation.

The use of temporary infrastructure arrangement eg onsite power generation, will result in pollution and noise from generators operating 24x7. It has been estimated by an independent chartered electrical engineer that based on the information available, a resilient temporary supply could require four 1MW generators, with three operating continuously. This could consume around 20,000 litres of diesel per day, requiring a 40,000 litre tanker delivery every two days.

Temporary infrastructure would result in a massive number of vehicle movements to deliver water and remove waste. This would cause further unnecessary pollution, as well as increasing the risk of accidents on an already dangerous road.

Noise Impact Assessment

The Noise Impact Assessment is totally inadequate in at least two major respects.

The very limited sample period takes no account of occasional but very loud and potentially psychologically damaging noise as follows: a military training area is located approximately 800 meters south of the proposed site where loud training takes place including gunfire and simulated explosions; the very low overflight of large military aircraft based at RAF Brise Norton and supporting parachute training at RAF Weston-on-the Green; the very low overflight of Chinook helicopters based at RAF Benson on low level training flights; the sound of gunfire from occasional Clay Pidgeon shooting immediately adjoining the northern boundary of the proposed site. While the local communities understand and accept these noisy activities, they could be very damaging to some of the "Service Users" and this risk must be taken into account.

Secondly, no account has been taken of the potential noise impact on the surrounding areas. It is very likely that a large number of "Service Users" along with the noise resulting from temporary infrastructure eg electrical generators would introduce loud and intrusive noise into what the Noise Impact Assessment has identified as a currently very quiet rural environment where currently there is a low level of road noise and some bird song.

At the very least, some effort must be made to simulate the noise of the proposed site and measure its impact on the surrounding communities and to take this impact into account.

Conservation of Wildlife

The whole approach to the Conservation of Wildlife in this proposal is inadequate.

The entire ecological evidence base for a 1,256-person development on ten hectares of a wildlife-rich former ordnance depot is one field survey, carried out between 26 March and 10 April 2026, with restricted access, outside the optimal window.

The desk study was run against the Buckinghamshire and Milton Keynes Environmental Records Centre. Piddington is in Oxfordshire. There is no reference anywhere in the application to a search of the Thames Valley Environmental Records Centre, which is the records centre for Oxfordshire.

No proper assessments have been undertaken as is illustrated by the Planning Proposal Statement, paragraph 7.34, which lists in the future tense: 1. Arncott Bridge SSSI Impact Zone: "mitigation requirements to be discussed with Natural England"; 2. Badgers: pre-construction checks recommended; 3. Hazel dormouse: "further site surveys are required"; 4. Bats (roosting): survey required; 5. Bats (in trees): survey required; 6. Bats (foraging and commuting): activity survey required; 7. Breeding birds: "further surveys … are required"; 8. Great crested newts: "further assessment required"; 9. Reptiles: "a reptile survey is required and will be carried out"

This application cannot be considered until all these Surveys and studies are completed without multiple conservation Laws being broken.

Lack of Detail Consistency and Accuracy in the application and its supporting documents.

This application is incomplete in multiple areas eg Wildlife Conservation Surveys and assessments.

It is inconsistent and incorrect in other areas. eg The site actually adjoins the Thame Road road, not the B1104 (transport assessment, ten times); B0411 (planning statement); B4001 (geo-environmental); A4011 (heritage, three times).

If a commercial organisation were to make a planning application with a similar level of incompleteness inconsistency and inaccuracy it would not even be accepted for consideration by any competent Planning Authority.

[redacted]
[redacted]
Piddington
[redacted]
[redacted]

33. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]
Date: 8th Sep 2026

Page 1 of 7 Objection By [redacted] 8th Sep 2026

OBJECTION TO APPLICATION PCU/RARE/C3105/3378843

Crown Development Comprising the Temporary Change of Use of the Defence Storage & Distribution Centre, MOD Bicester A Site

Dear Sir/Madam,

I wish to formally object to application PCU/RARE/C3105/3378843.

If anyone applied to build a 600-room hotel or a 300-property housing estate at this location, it would be instantly refused on the grounds that:

- There is no infrastructure.
- There are no utilities to support a development of this scale.
- The area is known to flood.
- The ecology of the site would constrain development.
- The sheer size of the proposal would be unsuitable and would overwhelm the nearby village of Piddington, increasing its population by approximately four times.

This is effectively what is being proposed under the above application.

I also recall a larger proposal for the site being rejected through the planning process in 2003.

Having reviewed the application documents, I am concerned that several are poorly worded, contain numerous spelling mistakes and are signed by a Mr XX. This suggests the submission may have been prepared quickly and without proper consultation or robust evidence gathering. This raises concerns regarding the reliability and quality of the information being relied upon to support the proposal.

I am also concerned that different application documents contain inconsistent figures relating to the size, phasing and capacity of the proposed development. One document refers to 3,510 service users, while other documents refer to 1,256 occupants. Such inconsistencies make it difficult to understand the true scale of the proposal and cast doubt on the accuracy of the supporting evidence.

I would now like to examine the supporting documents in more detail.

1. Utilities and Infrastructure Assessment

The Utilities and Infrastructure Assessment states that: "existing capacities within the utility networks are yet to be determined".

However, the same document indicates that the development could require approximately 2.16 MVA of electricity.

Page 2 of 7 Objection By [redacted] 8th Sep 2026

The assessment further states that the existing electricity infrastructure cannot be relied upon and that temporary and/or generator provision will therefore be incorporated.

This suggests that:

 At least four diesel generators may be required (three operational and one backup).
 Approximately 40,000 litres of diesel may be required every two days.
 Significant fuel deliveries will be required.
 Additional heavy vehicle movements will result.

This raises a number of serious concerns:

 Pollution generated by the diesel generators.
 Pollution generated by continuous fuel deliveries.
 Air quality impacts on neighbouring residents.
 Noise pollution from generators operating around the clock.
 The absence of any meaningful environmental impact assessment relating to generator use.

As an asthma sufferer, I am particularly aware of the importance of air quality and the health impacts associated with diesel emissions. Yet I have been unable to identify any detailed assessment of these impacts.

The costs associated with operating these generators also appear considerable. Based on current diesel prices, I estimate fuel costs of approximately:

 £24,000 per day.
 £730,000 per month.
 £8.76 million per year.

In addition, the noise pollution generated by:

 Approximately 1,250 occupants
 Required staff
 Multiple diesel generators.
 Constant traffic movements to and from the site.

would create a significant impact.

I have not seen any meaningful assessment addressing:

 Noise pollution, or its mitigation
 Light pollution, or its mitigation
 General environmental pollution.

2. Drainage, Sewage and Flood Risk

The plans indicate that a sewage treatment plant is intended to be constructed within the site because the condition and capacity of the existing drainage system is unknown.

My concerns include:

 The current drainage system is not understood.
 A sewage treatment facility will need to be installed, at tax payers costs.
 The proposed facility appears to be only 45 metres from dormitory-style accommodation.
 No explanation is provided regarding the cost or practicality of this arrangement.

If this were a private planning application, I do not believe such proximity would be accepted

without significant scrutiny.

The Drainage Design Statement states:

"No intrusive ground investigation has been undertaken at this stage."

It further confirms that:

"The position of the drains is currently unknown."

As a resident of the parish in which the site sits, I can confirm that the drainage system does not function effectively and that the site floods following periods of heavy rainfall.

It is difficult to understand how the Local Planning Authority can properly assess flood risk when:

- No intrusive ground investigation has been undertaken.
- The drainage system is unknown.
- Existing local flooding issues are well established.

3. Water Supply and Fire Safety

Piddington already experiences problems with water supply and water pressure.

However, the application does not demonstrate:

- Where water for the proposed development will come from.
- Whether existing infrastructure has sufficient capacity.
- The impact on existing residents.

No evidence has been provided to demonstrate that this issue has been properly assessed.

I would also like clarification regarding firefighting provision.

The Fire Safety Strategy appears to contain:

- No travel distances.
- No clear occupancy figures.
- No explanation regarding water supplies for firefighting purposes.

Occupancy figures also appear to differ between documents.

As a listed building owner, I am required to provide this information to my insurer every year. It is therefore surprising that such information appears to be absent from a development of this scale.

4. Highway Infrastructure and Road Safety

The site accesses directly onto the [redacted].

This road:

- Has experienced numerous road traffic collisions.
- Was recently the site of a fatal collision involving a child.
- Has no continuous pedestrian footway.
- Often becomes overgrown during summer months, with vegetation reaching waist height.

Even the submitted Transport Assessment concludes that:

- Walking is not a realistic option.
- Cycling is not recommended on a road subject to a 50mph speed limit.

The assessment also refers to:

 A 60mph speed limit.
 A road in Essex.
These references raise further concerns regarding whether a site-specific and robust assessment has actually been undertaken.
Additional concerns include:
 Palmer Avenue opposite is also subject to a 50mph speed limit.
 There are limited or no footpaths available.
 Safe pedestrian access is largely absent.
 Staff and Service users would be heavily reliant on private vehicles.

“If I needed to travel to shops in Arncott or Ambrosden, I would drive because I would not feel safe walking or cycling on those roads.”
That statement is based on my professional experience as a qualified Lowland Walk Leader trained in the risk assessment of walking alongside roads safely.
5. Land Contamination and Environmental Risk
I am particularly concerned that ground contamination has not been fully investigated.
Previous land quality work identified potential contamination concerns, yet:
 No borehole investigations appear to have been undertaken.
 No conclusive assessment has been carried out to resolve those concerns.
 There remains uncertainty regarding the condition of the land.
This could potentially create issues similar to those experienced at Upper Heyford involving so-called "forever chemicals".
The site is also known to contain asbestos.
However, I have been unable to identify any document explaining:
 How asbestos will be removed safely.
 How airborne contamination risks will be managed.
 What monitoring arrangements will be put in place to protect workers, residents and neighbouring communities.
6. Biodiversity and Environmental Protection
The scale of the proposal has the potential to affect local ecology, biodiversity and the character of the surrounding rural environment. Policies protecting biodiversity and green infrastructure are therefore relevant.
In particular, I consider the application potentially contrary to the principles contained within NPPF Paragraphs:
• Paragraph 8 – Sustainable Development.
• Paragraph 56 – Adequate assessment of impacts.
• Paragraphs 109-110 – Sustainable transport and transport choice.
• Paragraph 173 – Flood risk.
• Paragraphs 181-182 – Flood mitigation and drainage.

• Paragraph 187 – Protection of the natural environment.
• Paragraph 193 – Pollution and impacts on health.
• Paragraph 196 – Noise and quality of life.
•

7. Emergency Services Impact

I have not identified any assessment from:

 Thames Valley Police.
 South Central Ambulance Service.
 Oxfordshire Fire & Rescue Service

The proposal involves introducing approximately 1,250 people into the area, with some documents referring to considerably higher numbers. The proposal is of a planned accommodation style these services have no experience of.

Given the scale of the proposal, I would expect:

 Consultation with emergency services.
 Assessment of demand on policing resources.
 Assessment of demand on ambulance services.
 Consideration of emergency response times and capacity. A stroke sufferer was recently quoted a 4 hour wait for an ambulance.

I have not seen evidence that these matters have been adequately considered.

Conclusion

In summary, I object to this application because:

 Essential utility capacity remains unknown.
 Electrical supply appears dependent upon large-scale diesel generation.
 Air quality, noise and pollution impacts have not been adequately assessed.
 Drainage infrastructure remains unknown.
 Flood risk concerns remain unresolved.
 Water supply capacity has not been demonstrated.
 Fire safety information appears incomplete.
 Highway safety concerns remain significant.
 Ground contamination has not been fully investigated.
 Asbestos management has not been explained.
 The impacts upon emergency services appear not to have been assessed.
 Key figures relating to occupancy and capacity are inconsistent across the application documents.

Most significantly, the application repeatedly relies upon information that is described as:

 "Unknown".
 "Yet to be determined".

 Subject to future investigation.

I therefore respectfully request that planning permission be refused.

If the Secretary of State is nevertheless minded to approve the application, I ask that no decision is made until outstanding work concerning drainage, flooding, wastewater, contamination, ecology, highways, pedestrian safety, power supply, lighting, noise, fire safety and decommissioning has been completed and made available for proper scrutiny.

Yours faithfully,

[redacted]

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

34. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: not stated

[redacted]

Piddington

Bicester

[redacted]

Planning ref: PCU/RARE/C3105/3378843

Dear Secretary of State,

Please register my formal objection to application PCU/RARE/C3105/3378843 for the temporary change of use of the former defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation.

The site is situated within the Parish of Piddington and whilst I am resident of the village my objection is based on the proposal planning merits.

Firstly, the application was validated on the 2nd September 2026. This is after the introduction of the National Planning Policy Framework (NPPF) 2026. The application and all associated documents are drafted and referencing the NPPF 2024 which is now no longer the relevant national policy for determining the application. Neither the applicants, the SoS Home Office or the SoS Housing, Communities and Local Government, have set out how the application is now compliant with the new policy framework.

There are a number of discrepancies and inaccuracies across the application and it's supporting evidence that you as the decision maker need to be satisfied do not fundamentally undermine the application and therefore your decision. The application form states the site is vacant but in various evidence documents it states that the site is tenanted. It is also known locally that some of the buildings are leased out.

There are also questions over the status of the site. Some documentation refer to the site as greenfield whereas by the planning definition, as set out in the NPPF 2026, the site is previously developed land. Whilst I have only identified two discrepancies and inaccuracies there are multiple across this application. You as the decision makers have to seek for the applicant to correct all of these across all documents and reconsult on the application to ensure the statutory consultees have appropriate time to be consulted on a truthful and lawful application. You need to have confidence in the information presented in the application you are determining.

The application is wholly inappropriate development in an unsustainable location outside of a settlement. Whilst policy criteria 1D of S5: Principle of development outside settlements is met through this application, this application doesn't meet other policy criteria. Criteria 1H requires development to be within walking distance to a well connected station or well related. It further requires development scale which can be accommodated taking into

account the existing or proposed availability of infrastructure. Criteria 1E and I are also not met. Policy S5 further goes on to state that “should only be approved in exceptional circumstances where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.” The benefits of this proposal do not outweigh the adverse effects of this policy criteria.

The application site is not in a sustainable location. The site is accessed off the [redacted], which the transport assessment has incorrectly provided details for the B1104, which is unlit without street lights. There are no cycle routes from the site to Bicester or other nearby settlements. This means that there are no safe routes for sustainable modes of transport to access the site. This means staff on the site will be reliant on private cars, this goes against TR3: Locating development in sustainable locations. The application itself states it at paragraph 2.10 of the Planning Proposal Statement “There are very limited facilities in the immediate vicinity of the Site, reflecting its rural location and lack of direct pedestrian connectivity to nearby settlements.”

Furthermore, this places the service users at risk when leaving the site. The Proposal Statement states that limited travel by bus or minibus will be available. This means that as the site is non detention service users will be forced to leave the site as pedestrians putting themselves at great risk. Public bus services at the nearest bus stop have recently been reduced making them even more infrequent than what they previously were.

Lastly the application fails to meet or properly address the impact of noise, light and air pollution from the development on the residents of neighbouring property and properties with Piddington. Policy P3 Living conditions and pollution criteria 1 requires “Development proposals should be appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, whether these effects are on or off-site; and whether this is as a result of the development itself or the product of preexisting conditions in its vicinity… as well as that of the environment and population in the surrounding area (including where certain groups could be particularly vulnerable to its effects, such as children and older people).”

The noise assessment makes no assessment for a generator running permanently to provide the site with electricity. This assessment needs to be addressed before any development occurs and appropriate mitigation and monitoring set out. Whilst the noise assessment acknowledges its impact of external noise it fails to acknowledge that the site currently has minimal audible disruption and any increase will have a significant impact even though it is below required levels.

The air quality assessment also doesn't consider the pollution produced by having to permanently run generators for electricity. There has been no assessment on the impact of light pollution, instead leaving this to a pre commencement condition. This lack of information on pollutants has meant this application cannot satisfy policy P3 and further work

is needed to ensure Policy P3 is satisfied.

It is for the above reason that I object to this application, there is a serious lack of information accompanying this application which does not mean national or local planning policies.

Yours sincerely,

[redacted]

35. [redacted]

Address: [redacted], Piddington, [redacted]
Date: not stated

Reference:- PCU/RARE/C3105/3378843

Dear Sir/Madam,

I am a resident of Piddington and am writing to formally object to planning application concerning the proposed use of the former MOD Bicester Site A for asylum accommodation for up to approximately 1,256 people.

I object because I believe the site is fundamentally unsuitable for a development of this scale. The application has not adequately demonstrated that the environmental, infrastructure, drainage, transport, public-service and residential-amenity impacts can be satisfactorily addressed.

1. Unsuitable and isolated location

The proposed development is located on a former military site in an isolated rural location, immediately affecting the small community of Piddington.

Accommodation for more than 1,000 people would be disproportionate to the size and infrastructure of the surrounding villages. Piddington does not appear to have the services, transport infrastructure or facilities required to support a development of this scale.

I am concerned about additional pressure on local roads, emergency services, healthcare, policing and other public services.

I request that the Council require:

- a detailed assessment of the capacity of local services;
- evidence from the relevant service providers, including healthcare, policing, fire and ambulance services;
- a full assessment of the development's effect on Piddington and nearby villages; and
- a clear infrastructure and service-management plan, secured by an enforceable planning condition or legal agreement.

2. Traffic, access and road safety

The local roads around Piddington are rural and are not designed to accommodate the additional traffic associated with a site of this size.

There will be movements by staff, contractors, deliveries, waste vehicles, emergency vehicles and other traffic. I am concerned that the existing road network does not provide adequate capacity or safe facilities for this level of activity.

The safety of pedestrians, cyclists and local residents is particularly important because the surrounding roads are narrow and have limited pedestrian infrastructure.

I request that the Council require:

- a comprehensive transport assessment based on the maximum proposed occupancy;
- traffic counts and modelling for staff, deliveries, waste collection, visitors and emergency vehicles;
- a road-safety audit covering all affected routes and junctions;
- details of pedestrian and cycling routes, lighting and crossing facilities;
- a construction traffic-management plan;
- an operational traffic-management plan; and
- enforceable conditions controlling delivery times, vehicle routes, parking and site access.

No development should commence until the Highway Authority confirms that the access arrangements and surrounding highway network are safe and adequate.

3. Diesel generators, air pollution and noise

I am extremely concerned about the proposed use of diesel generators and the resulting emissions and noise.

If diesel generators are required to provide substantial power for a development of this scale, the application should provide clear, independently assessed evidence regarding:

- the number, type and capacity of generators;
- their proposed locations;
- expected operating hours and frequency;
- nitrogen dioxide, particulate and other emissions;
- noise levels at nearby homes;
- cumulative noise and air-quality effects;
- fuel-storage and delivery arrangements; and
- emergency procedures in the event of generator failure or fuel leakage.

Piddington is a rural community, and residents should not be expected to accept continuous industrial-scale generator noise and emissions close to their homes.

I request that the Council require:

- a detailed air-quality assessment;
- a BS 4142 noise assessment and construction-noise assessment;
- a generator-management plan;
- continuous monitoring of noise and air quality where appropriate;
- limits on generator operating hours, except where required for genuine emergencies;
- suitable acoustic enclosures and silencers;
- safe fuel-storage arrangements; and
- a condition requiring the use of the cleanest practicable power source and connection to the electricity grid where feasible.

The Council should not approve the proposal unless it is satisfied that generator emissions and noise would not cause unacceptable harm to residents or the environment.

4. Light pollution

The proposed facility would operate 24 hours a day and would require security lighting, accommodation lighting, lighting for roads and parking areas, access-point lighting and other external illumination.

This could substantially increase artificial light in a relatively dark rural environment and adversely affect residents, wildlife and nocturnal species.

I request that the Council require:

- a full external-lighting assessment;
- a lighting plan showing the location, height, intensity, colour temperature and operating hours of all lights;
- evidence that lighting will be directed downwards and away from homes, roads and wildlife habitats;
- shielding and dimming controls;

- motion sensors where appropriate;
- a condition preventing unnecessary all-night lighting; and
- a post-installation lighting review, with corrective measures if unacceptable light spill occurs.

The lighting assessment should specifically consider the effect on protected bats and other nocturnal wildlife.

5. Drainage, flooding and wastewater

The area has a history of standing water and flooding, and the local ground conditions and drainage characteristics make this a particularly important concern.

The proposed development would introduce accommodation, roads, parking, hardstanding and associated infrastructure. These could increase surface-water runoff and place additional pressure on existing drainage systems.

The application proposes a wastewater treatment plant, but this does not remove my concerns. The Council must be satisfied that the proposed wastewater and surface-water systems can operate safely and reliably during heavy rainfall, high groundwater and flooding.

There must be no risk of untreated or inadequately treated wastewater entering surrounding land, drainage ditches or watercourses.

I request that the Council require:

- a site-specific flood-risk assessment;
- evidence of historic flooding and groundwater conditions;
- detailed surface-water drainage calculations;
- a sustainable drainage strategy;
- details of attenuation, storage and discharge rates;
- evidence that the drainage system can cope with extreme rainfall events;
- details of the wastewater treatment plant’s capacity, maintenance and emergency arrangements;
- monitoring of treated effluent and discharge quality;
- a contingency plan for treatment-plant failure, power failure or flooding;
- confirmation from the relevant drainage and environmental authorities that the proposals are acceptable; and
- a condition preventing occupation until the drainage and wastewater systems have been installed, tested and approved.

The Council should also require a long-term management and maintenance plan identifying who will be responsible for the systems and how failures will be reported and remedied.

6. Wildlife and protected bats

I am extremely concerned about the demolition of existing buildings and the potential impact on protected bat species.

There are bats associated with buildings on the site, and I understand that some of the buildings proposed for demolition may have ecological value. Bats and their roosts are legally protected.

Demolition should not proceed unless a proper ecological assessment has established that there would be no unacceptable impact and that all necessary licences, mitigation and compensation measures are in place.

I request that the Council require:

- an up-to-date bat survey covering all buildings proposed for demolition or alteration;

- surveys undertaken during appropriate seasons and in accordance with current best practice;
- an assessment of potential roosts and commuting routes;
- confirmation that any required Natural England licence has been obtained before works begin;
- a detailed mitigation and compensation strategy;
- a lighting plan designed to protect bat flight paths and feeding areas;
- an ecological clerk of works during demolition and construction; and
- a condition preventing demolition until all ecological requirements have been satisfied.

The ecological evidence should be independently scrutinised before permission is granted . The scale of the proposal is disproportionate to its rural setting. Accommodation for up to 1,256 people would effectively create a substantial new community in a location that lacks the infrastructure normally expected to support a development of this magnitude.

The fact that the proposal is described as temporary does not remove the need to assess its full impacts. Temporary development can still cause significant environmental, traffic, infrastructure and community consequences.

I am concerned about the substantial cost to taxpayers associated with establishing and operating accommodation of this scale.

I appreciate that financial considerations alone may not determine a planning application. However, given the exceptional scale of the proposal and the public expenditure involved, there should be transparency regarding the cost, duration and necessity of the proposed arrangements.

It would be inappropriate for a development potentially costing hundreds of millions of pounds to proceed at an unsuitable location without demonstrating that the site represents a properly considered and sustainable

The individual impacts of the proposal should not be considered in isolation. The combined effects of additional traffic, generator emissions and noise, artificial lighting, wastewater and drainage infrastructure, flood risk, demolition of existing buildings and potential impacts on protected wildlife could be significant.

I request that the Council require a cumulative-impact assessment covering all of these matters.

As a resident of Piddington, I believe the local community should not be expected to bear these consequences without compelling evidence that this is a suitable location and that all associated risks can be satisfactorily mitigated.

For these reasons, I strongly object to application 26/01833/CROWN and request that planning permission be refused.

Yours faithfully,

**Malcolm **[redacted]

Resident of Piddington

[redacted], Piddington, [redacted]

36. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 08/09/2026

Dear Sirs

Application ref: PCU/RARE/C3105/3378843

I am writing to object to the above Crown Development Plan for Site A Bicester.

As the site was previously found to be unsuitable for a smaller accommodation centre proposed in the early 2000s, I do not understand what has changed that now makes it a possibility.

This new application and documentation seem rushed, incomplete and inconsistent; the application records the proposed development as a Secure Residential Institution, C2A which is for prisons and detention centres and in contrast to the government's description that residents will be free to come and go and surely is therefore not applicable for this application?

The Statement of National Importance confirm a capacity of 1250 men which is more than four times the entire recorded population of Piddington; however, I note that in another part of the application there is reference to residents numbering 3510, nearly three times the capacity stated elsewhere. This makes the application information appear very unreliable.

To further explore the inconsistencies in the application, we can take as an example that the location of the site is not even correct; it is noted as being in Essex in the transport assessment with the wrong road number given at least ten times. This could be the reason that no proper consideration has been given to road safety, the increase in traffic on a key link road between Thame and Bicester and a road that is totally unsuitable for pedestrians or cyclists.

The site is quoted as being' an irregular shaped greenfield area', yet it is actually noted elsewhere (correctly) that it's a 1943 ordnance depot with hardstanding, railway sidings, asbestos and possible unexploded ordnance. Just this latter point alone should lead to the conclusion that the site is unsuitable. Loca lpeople will have many stories of WW2 and post WW2 munitions activities at the site.

Further investigation evidences that no proper consideration has been given to the provision of mains services:

Sewage: there is no wastewater on site, the site has never been used for accommodation and the approach to drainage/foul water disposal is inconsistent: one document refers to a new on-site works discharging to a watercourse (drainage and utilities) and another states that "foul water will be connected to the mains" yet there is no evidence that Thames Water have confirmed this. The volumes of waste generated in a site this size would be considerable.

Water: the area already suffers from low water pressure and increasing demand to supply the residents of the site (whether 1250 plus staff or 3510 plus staff) would put an

unreasonable demand upon the local supplies and lead to supply difficulties.
Flood risk: Piddington is a low lying village that suffers from flooding regularly; it is documented in the report that a quarter of the site has a high chance of surface water flooding in any one year which would be undesirable for the residents of the site.
Discharge into local watercourses relating to sewage processing would greatly increase the risk of flooding to the village which lies below the site. At times the village can already become difficult to access during times of flooding and this site would exacerbate that due to run off, the size of local waterways and no suggestion of any drainage and water collection to mitigate the impact on the local area.
Power: relying on power generators at the site would be an excessively expensive route to go down as well as polluting the air and creating even more noise than that made by 1240 men (or is it 3510 men?). Piddington already suffers from frequent power outages so it is clear that the grid is not suitable for the site to be connected as it would be detrimental to the local area.
Heating: many of the occupants will have come from warmer climates and so a great deal of fuel will need to be provided to keep the place at a suitable temperature and provide hot water for the residents and staff. As the site currently has no accommodation, heating needs to be installed and fuel brought in to the site to satisfy this, along with the appropriate water supply.
Provision of services will bring many, many lorry movements along the local roads and on and off the site which will be dangerous for local traffic and residents. Add to this staff transport, minibuses to take the occupants into towns, fuel lorries, sewage lorries, water tankers, more fuel for generators etc.
Light pollution added to the noise alone from the 24 hour site (which it would be impossible to mitigate) is a further reason that this plan should be abandoned. This would put undue stress on the locals who moved to the village to get away from the noise and disturbances of living amongst many people and I myself am already experiencing anxiety around the prospect of this change to our environment.
Ecological concerns: we are fortunate to live in an area with a good deal of wildlife including rare animals. Great crested newts are found in local waterways - the applicant’s own ecological report says that their survey is not comprehensive and the wild flora and fauna will be seriously impacted by this site and the scale of development.
The proposal would have more weight if it were factually correct and consistent, there was evidence of a site management plan and that the names of all of the people involved in the assessments were not invisible.
I would also like to know why a proposal has been submitted with so many paragraphs redacted - what does the government not want us to see in the proposal?
I hope that the Planning Inspectorate will turn this proposal down for good.
Yours faithfully

[redacted]

[redacted]

Piddington

[redacted]

37. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 13th September 2026

To Piddington Parish Council

Application Reference: PCU/RARE/C3105/3378843

Dear Sirs

Site A Piddington

I am writing to object to the proposed asylum centre at Site A. The proposal is inconceived and lacking in detail with no appreciation of the local environment and the nearby village of Piddington.

As part of my objection I wish to reference the scale of the project as the proposed bedspaces of 1256 is more than four times the number of residents in Piddington, which is the nearest village to the site. I am concerned by reference in the site's own preliminary Unexploded Ordnance Risk Assessment that refers to "accommodation for 3510 service users". This suggests the eventual scale may be considerably larger than the figure that we have been told. Is this a mistake or a cover up of the actual figures - greater clarity is needed on the government's actual intent. Additionally, the applicant's own geo-environmental assessment mentions the historical use of the site for wartime ordnance and also flags asbestos containing materials as a further contamination risk in the ground but also this exists in the buildings.

Further to my objection is the lack of and inconsistency of information concerning site layout, external lighting, security fencing, parking facilities etc. The site gives onto a fast moving important road connecting Bicester and Thame and the proposal's own Transport Assessment's baseline traffic and speed data relate to a road in Essex! This has been transferred from a comparable scheme in a completely different part of the UK!. This surely invalidates the data regarding traffic and missing data.

No site specific assessments seem to have been made with the local services, (fire, police, ambulance) nor Highways regarding the additional traffic load nor the flood authority and this is a low lying area with regular flooding, evidenced in the applicant's own data as happening within the site where they propose putting the accommodation blocks.

I would like to ask for more information to why the applicant believes this to be a suitable site given independent evidence available, including High Court findings that this type of site ie large-scale, isolated institutional accommodation of this kind carries a high risk of mental health deterioration among the occupants. Surely the Home Office must be required to assess the equalities impact of its own allocation policy? Can the Home Office really ignore a High Court judgement against it earlier this year concerning the policy that governs how people are allocated to sites such as Site A? I believe that welfare and safeguarding risks at this site are foreseeable and must be properly assessed in advance of occupation.

Leading on from this is the fact that no welfare and safeguarding risk assessment has been

carried out in respect of the villagers and in particular the women and children. This refers back to the number of service users at the site that could be between 1250 and 3500 which vastly outnumbers the local villagers. As the site will be an open site, this raises concerns with local residents. There are only just over 6000 people in the entire Launton and Otmoor so the proposed occupation level adds a great many people to the area.

There is conflict with local planning policy as the proposal is difficult to reconcile with policies adopted in the Cherwell Local Plan 2011-2031 including Policy PSD1, Policy SLE4 and Policy INF1 as well as the environment and heritage protection policies.

No evidence has been published of a proper options appraisal that explains why this site is deemed the most economical and suitable site compared to other alternatives (dispersed housing, smaller sites or repurposed buildings). A comparable Home Office accommodation programme in the early 2000s was discontinued due to the spiralling costs and value for money concerns recorded by the National Audit office. Why is this not mentioned in the proposal and where is the cost analysis?

I am very concerned that there do not seem to be any published plans on the day to day running of the site and the management programme and I am also concerned by the large volume of redacted information within the Proposal.

The environmental assessment is skimpy and lacks enough detail to really be of use to the proposal and it states therein that there are a number of protected species surveys remaining outstanding. The submission of a proposal of this scale without the full surveys raises questions as to the standard of care that has gone into the proposal which seems very rushed and incomplete.

These are only examples of why this proposal should be rejected as unsuitable and I will look forward to hearing that this huge project will be scrapped.

Yours faithfully,

[redacted]

38. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 12 September 2026

Dear Sir/Madam,

Objection to Planning Application PCU/RARE/C3105/3378843

I am writing to you today, Saturday 12th September 2026, to object to this application because I have serious concerns about the safety of the B4100, pedestrian access to the site, and whether there is enough reliable electricity to support a development of this size.

I use the B4100 regularly myself, including for childcare drop-offs and collections, so I am very familiar with the road and the traffic conditions. I have genuine concerns about how the proposed development could affect the safety of people using this road on a daily basis.

The B4100 is already a very busy road, with approximately 3,000 vehicles travelling in each direction every day. Traffic is travelling at around 53–54 mph immediately outside the proposed site entrance. There have also been three collisions on this stretch of road in the last five years.

With those existing conditions, I am very concerned about the safety of vehicles entering and leaving the site. Adding a development of this size will inevitably mean more vehicle movements, and I do not believe the current road conditions provide a safe environment for this.

I am even more concerned about pedestrian safety. The footpath is only around 1 metre wide in some places and does not exist at all in others. This is a major concern when you have a road carrying this amount of traffic at speeds of around 53–54 mph. The Department for Transport recommends a 2-metre minimum footway width in appropriate circumstances, yet the existing provision falls well short of this in places.

The number of people walking to and from the site also needs to be properly considered. The proposed accommodation is for around 1,250 people, and many of those residents will not have their own vehicles. It is therefore reasonable to expect increased pedestrian movements along the B4100. I am concerned that the existing footpaths simply cannot safely cope with this.

As someone who regularly uses the road for childcare drop-offs, I am particularly concerned about the impact this could have on children, families and other vulnerable pedestrians using the area. Putting a large number of pedestrians alongside a busy road travelling at over 50 mph, with sections where there is little or no footpath, creates a real and foreseeable safety risk.

I also have serious concerns about the electricity supply.

There is no gas supply to the proposed site, meaning that heating, hot water and cooking for approximately 1,250 people will all depend on electricity. That is a very substantial demand.

My understanding is that the capacity, condition and configuration of the existing electrical network have not been established or independently verified. If the available capacity is uncertain, I do not think it has been demonstrated that the site can be supplied safely and reliably.

I am particularly concerned about the possibility of the development having to rely on temporary or permanent generators if the electricity network cannot provide the required capacity. Generators

should not simply be treated as an easy solution to an unconfirmed electricity supply, particularly for a site of this size. They could bring additional noise, air quality, fuel storage, maintenance and vehicle movement issues.

In my view, these matters should be properly resolved and demonstrated before planning permission is granted, rather than being dealt with after the development is approved.

The combination of high traffic volumes, speeds of around 53–54 mph, three previous collisions, inadequate and missing footpaths, potentially significant pedestrian movements, and an unverified electricity supply for a site of approximately 1,250 people raises serious questions about whether this is a suitable and safe location for the proposed development.

For these reasons, I strongly object to application PCU/RARE/C3105/3378843 and ask that planning permission is refused unless and until the highway, pedestrian and electricity concerns have been fully investigated and independently demonstrated to be safe and adequate. I do not believe permission should be granted on the basis of assumptions about future highway improvements or an electricity connection that has not yet been properly verified. The safety of people using the B4100 and the reliability of essential services for a site of this size should be established before, not after, permission is given.

I would also appreciate written confirmation that this objection has been received and formally recorded against the application. I would be grateful for a response to the concerns I have raised and would also like to be kept informed of the next steps in the planning process, including any further consultations, assessments or changes to the proposal that may affect these issues.

Please also confirm how I will be notified of the eventual decision on the application.

Thank you for taking the time to consider my concerns. I look forward to receiving your confirmation and response.

Yours faithfully,

[redacted]

[redacted]

Piddington

[redacted]

39. [redacted]

Address: [redacted], Piddington, [redacted]
Date: Saturday 12th September 2026

Planning Reference: PCU/RARE/C3105/3378843

Dear Sir/Madam,

Objection to the proposed development at MOD Bicester Site A

I am writing to formally object to the proposed development at MOD Bicester Site A dated today, Saturday 12th September 2026.

I live directly behind the proposed site and can actually see the site boundary from my front door. Because of this, this proposal is not something that will simply have an impact on the wider area — it will be directly on my doorstep and will affect my home and my everyday life.

I have looked at the plans and listened to the information that has been provided, and I keep coming back to one simple question:

How on earth is this going to work here?

The proposal is for accommodation for up to 1,256 people, along with all the roads, buildings, services, vehicles, utilities and other infrastructure that come with a development of this size.

Our village is a rural village with very limited infrastructure, and I am genuinely uneasy about whether the impact of putting something of this scale here has been properly considered.

Water

One of my biggest concerns is water.

Our village is currently experiencing water restrictions, so I find it very difficult to understand how a development for up to 1,256 people is going to be supplied with enough water without putting additional pressure on the existing system.

The applicant’s own utilities assessment refers to limited capacity within the existing water network.

I have also seen no evidence that Thames Water has confirmed in writing that the existing water supply and network can accommodate the additional demand created by a development of this scale.

I would therefore like to know whether the water supply has actually been confirmed as being capable of supporting up to 1,256 additional residents, rather than simply assuming that sufficient capacity will be available.

It is particularly troubling to me that the existing village is already experiencing restrictions, yet we are being asked to accept a development that could bring more than a thousand additional people into the area. I believe written confirmation from Thames Water should be provided before this application is allowed to proceed.

Electricity and diesel generators

I also have serious reservations about the electricity arrangements.

Our village has experienced power cuts in the past, particularly during the winter. Although things have improved recently, power cuts have been a regular problem here.

The applicant's own information states that the existing electricity capacity has not yet been verified and that the proposed development could have an electrical demand of around 2.16 MVA.

It also identifies the need for temporary and/or permanent generators.

This is particularly alarming to me because I live immediately behind the site.

I am especially uneasy about the possibility of diesel generators operating close to my home, potentially day and night.

I am concerned about the noise, fumes and air pollution they could produce, as well as the effect of having this kind of industrial equipment operating so close to people's homes.

I would like a clear explanation of:

- how many generators will be needed;
- where they will be located;
- whether they will be diesel generators;
- whether they will be the main power supply or backup;
- how often they could operate;
- whether they could operate throughout the night;
- how noisy they will be; and
- exactly what emissions they will produce.

I am particularly troubled that the air-quality information provided does not appear to properly address the emissions from generators, despite the utilities information identifying generators as part of the proposed electricity solution.

I don't think residents living immediately next to the site should be expected to simply accept the noise and fumes from generators without this being properly assessed.

The Fast Track Urgent Crown Development procedure

I am also uneasy about the fact that this application is being dealt with under the Fast Track Urgent Crown Development procedure.

I understand that the development is being treated as urgent, but I do not believe that urgency should mean that important questions about the site's infrastructure are left unresolved.

The applicant's own information identifies uncertainty around the existing electricity capacity and water capacity, while the development would accommodate up to 1,256 people and require substantial supporting infrastructure.

These are not minor details. They are fundamental questions about whether this site is actually suitable and capable of supporting a development of this scale.

I am particularly troubled that the fast-track nature of the process gives residents very little time to properly understand the proposals and raise concerns about infrastructure that could have a direct and long-term effect on our homes and village.

I would ask that the use of an urgent Crown development procedure does not result in these outstanding infrastructure issues being overlooked or dealt with later. They should be properly assessed and demonstrated to be workable before the development is allowed to proceed.

The overall impact on our village

This is probably my biggest concern of all.

It is not one particular issue that makes me object.

It is everything together.

We have had problems with power cuts.

We have water restrictions.

And now we are being asked to accommodate a development for up to 1,256 people, together with all the infrastructure needed to support them.

I genuinely struggle to understand how this can work without having a very significant impact on the existing village and the people who already live here.

I am not saying that these problems cannot ever be solved. What I am saying is that I do not believe it has been properly demonstrated that they have been solved.

For someone who lives directly behind the site, that is extremely unsettling.

My request

I respectfully ask that this application is refused unless the applicant can properly demonstrate that the issues surrounding:

- water supply, including written confirmation from Thames Water that the network can accommodate the additional demand;

- electricity capacity;
- diesel generators and their emissions and noise; and
- the overall cumulative impact on the existing village

can all be satisfactorily addressed.

I would also ask that the fact that some of these problems already exist in our village is taken into account when considering the application.

I am not objecting simply because I do not like the proposal. I am objecting because I live directly behind this site and I am genuinely concerned about what a development of this scale will mean for my home, my family and our village.

I hope that the decision-makers will listen to the residents who actually live here and understand the limitations of the existing infrastructure.

I would be grateful if you could confirm receipt of this objection and keep me informed of any significant updates, consultation outcomes, further information submitted by the applicant, and the next steps and progress of this planning application.

Thank you for taking the time to consider my objection.

Yours faithfully,

[redacted]

[redacted]

Piddington

[redacted]

40. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 14th September 2026

[redacted]

Piddington

[redacted]

14th September 2026

Reference PCU/RARE/C3105/3378843

Dear Planning Inspectorates Crown Development Casework Unit

Regarding change of use and development of Site A, MOD Bicester which we OPPOSE for the following reasons.

We, [redacted] recently moved to [redacted], Piddington. Approximately three weeks after our move we were informed by the local Parish Council about the proposed change of use and redevelopment of Site A to house 1256 male asylum seekers. We were completely shocked as we had undertaken rigorous planning searches through our solicitor prior to purchasing [redacted]. We then learnt that this plan was covertly routed under "urgent Crown development" with also no statutory requirement for public consultation. We certainly feel we have wasted some of our legal fees in investigating local planning!

As an Outreach Worker supporting Adults in Buckinghamshire and Oxfordshire I (Lucy) experience first hand how under resourced our health, mental health and social care services are. I am also aware these services were not consulted in the planning process of this site. I am very concerned these local services won't be able to adequately support an additional 1256 adults without additional resources and funding. In turn it will further affect their ability to support the existing community.

We moved to Piddington to experience a peaceful rural lifestyle with countryside walks and dog walks on our doorstep. The additional traffic entering Site A for workers and supply services will impact the road network and increase traffic, noise and pollution in and close to Piddington. No site water treatment and no clear plan on how power will be supplied to Site A also indicates external services will need to be supplied which again increases traffic, noise and pollution in and close to Piddington.

Additionally access to the local park and footpaths close to Site A with no risk and safeguarding assessment of the residence of Site A and increased traffic will impact how safely residents and children can access these areas.

We were also very concerned about the bat population within Site A and that no comprehensive ecology assessment has been completed.

Finally we question whether the change of use of Site A offers value for money for the British Tax Payer considering the site has been derelict for many years and will require significant investment to redevelop and maintain.

Yours Sincerely

[redacted]

41. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: 14 September 2026

Dear Crown Development Casework Unit,

Application Reference: PCU/RARE/C3105/3378843.

Since hearing of the planned Asylum site "A" adjacent to Piddington I have had several concerns that make me "strongly object" to the weak planning application and Crown Planning Laws being applied.

1. Toxic Water Run off: One of my concerns is the area as a whole and including Site A is a flood plain, I have witnessed various states of flooding in my 11 years living in Piddington. I would urge that the site be unfit as more than half has a relevant risk of surface water flooding. This has 2 problems one to the occupants of the site, buildings and infrastructure which includes sewage which would easily displace raw material on the site but more importantly to the wildlife that would receive any of the Toxic water run off. We have some rare birds that rely on the wet land meadows for feeding and breeding, that includes fields all round the site A areas. The toxic water run off from site A will be off a grave detriment to Curlews and other wading birds when flooding happens and this is extremely likely. The boundary of Upper Ray meadows is a few hundred metres away and this has been a sanctuary for wildlife.

2. Noise: I am not sure of the exact noise pollution that will come from site A with 1250 males living their daily lives, but Wethersfield in Essex would be a good example to use, they have half the asylum numbers we are projected to have and the noise is a constant. I moved to Piddington as I have a need for quiet and calm of which Piddington provides that to me as there are few people and a single row of houses that gives me open fields to look upon, this proposed site A will mean a constant noise 24-7. Again, the rare wildlife that has thrived undisturbed for many years will not thrive in this constant noise.

3. Bats and rare birds: I know for a fact that there are rare bats in and directly around Site A, please do not cut corners here, in the summer months bats are flying in front and behind my house at dusk. I do not want that to change. These bats and birds will never return once the Asylum camp is running due to noise and light pollution, these pockets of nature are few and far between in these days of development. This site does not need to be here. Massive money is needed to convert the site for delivery of water, electric and sewage, there are cheaper places with better infrastructure and less rare wildlife that depends on the undisturbed surroundings.

This area is fragile and is also linked to a fragile nature reserve, you can not sympathetically build an Asylum camp next to a historic village that is recorded in the Doomsday book.

a. As stated, I strongly object to such a disproportionally large site being introduced into a flood risk area, the risk of toxic water run off is very real and will affect wildlife should sewage and drains be compromised from 1250 male occupants.

b. I will not have the calm I need and the wildlife will not thrive due to constant noise and light pollution in the environment; the noise would be unacceptable and damage resident's health who are used to quiet and calm. Even when we have a meeting in the village hall with 50 residents the noise is deafening, 1250 will be like a constant small football stadium noise. We have taken noise readings of our area through out the day and would do similar noise readings if the planning is passed.

This site is totally unacceptable for noise and light that will affect residents and wildlife. It is unacceptable due to Costs regards to grass roots build of sewage, electric and water and toxic water run off risk (exacerbated from 1256 men) due to the nature of the flooding that happens every year, on and around that site.

Kind Regards

[redacted]

14.09.2026

[redacted],

Piddington,

Bicester.

[redacted].

42. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 13 September 2026

Application Reference: PCU/RARE/C3105/3378843

Date: 13 September 2026

Dear Piddington Parish Council,

RE: Site A, MOD Bicester – Formal Objection

I am writing to object to the proposed development at Site A, MOD Bicester for the accommodation of up to 1,256 single adult men.

I am a mother of three young children and live at [redacted], Piddington, [redacted]. I drive my children to school along Widnell Lane every weekday morning and afternoon, and we regularly use the local playground and Jubilee Nature Reserve for bike rides and dog walks as a family.

Highways and pedestrian safety

My primary concern is of course the safety of my young family. Specifically road safety on Widnell Lane, which I use twice daily for the school run. The Transport Assessment contains no traffic count, no collision search and no safety assessment whatsoever for Widnell Lane itself. This is extraordinary given that this is the direct route to Piddington and the road my family relies on every single day.

I have personally witnessed how narrow and fast this road is. Where there is a footway at all, it is roughly one metre wide, yet the Department for Transport's own inclusive design guidance recommends a minimum of two metres. The 85th percentile speeds on the approach roads are around 53–54 mph. When I am driving my children, I regularly see pedestrians (including children and dog walkers) pressed against the verge as vehicles pass at speed, and I worry constantly about what would happen if one of my children were walking or cycling along this stretch.

The recorded road safety incident near Blackthorn in 2024, in which a young child died, is a matter of public record. As a parent using this same road corridor daily, this tragedy underlines why getting this assessment right is not just a planning formality – it is a matter of life and death.

A development of this scale will generate significant additional traffic from coaches, minibuses, delivery vehicles, staff cars and service vehicles. Yet the junction capacity modelling that concludes there is "plenty of spare capacity" carries the software's own warnings that heavy vehicle traffic was set to zero in three of the four modelled scenarios. That does not reflect the reality of what this site will generate, and it does not reflect the reality of the road I drive my children along every day.

Local services and school capacity

My youngest child attends the local school in Brill, three miles from the proposed site. No site-specific capacity assessment appears to have been agreed with the relevant

local education authority or with the NHS, police, fire or ambulance services. Given that this proposal would bring 1,256 people – more than four times the entire recorded population of Piddington – into our immediate area, I find it impossible to believe that our local services, such as the Brill GP surgery and emergency services can simply absorb this demand without any formal assessment or planning.

The rushed process

I am also deeply concerned about the process being used. There is no statutory requirement for public consultation under this fast-track procedure, no guaranteed minimum period for representations, and no requirement to notify neighbouring residents directly. If the Parish Council had not chosen to run its own consultation, families like mine would have had no formal opportunity to raise these concerns at all.

The Home Office's own factsheet states a minimum operational life of ten years for the site, and its own Statement of National Importance says that, over time, the site is intended to be expanded for use as a long-term asylum accommodation solution. That is difficult to square with a case built on urgency, and it suggests that the scale being planned for may be considerably larger than what is being presented to us now.

What I am asking for

I ask that the Parish Council robustly oppose this application and ensure that my concerns, and those of other families in our community, are fully represented in its submission to the decision-maker. Specifically, I ask that:

• No decision be made until a proper, site-specific safety assessment of Widnell Lane has been carried out and published.

• No decision be made until formal capacity assessments have been agreed with the local school, NHS, police, fire and ambulance services.

• The decision-maker be asked to clarify why a site-specific highways assessment for the route used by families every day has been omitted from the Transport Assessment.

I am copying this response directly to the Planning Inspectorate and to Cherwell District Council to ensure it is also treated as a formal representation.

Please acknowledge receipt of this objection and keep me informed of all further developments.

Yours faithfully,

[redacted]

[redacted], Piddington, [redacted]

43. [redacted], CEng MICE

Address: [redacted], Piddington, [redacted]
Date: 13 September 2026

Application Reference: PCU/RARE/C3105/3378843

Date: 13 September 2026

Dear Piddington Parish Council,

RE: Site A, MOD Bicester – Formal Objection

I am writing to object to the proposed development at Site A, MOD Bicester for the accommodation of up to 1,256 single adult men.

I am a father of three children, a Chartered Civil Engineer, and live at [redacted], Piddington, [redacted]. I walk my dog along the footpath adjacent to the proposed site every morning, and I use the [redacted] and local roads regularly with my family.

I have a number of serious concerns about the proposed development, which I have noted in the following pages:

1. Professional concern: inadequate technical assessment

As a civil engineer, I am professionally qualified to assess infrastructure proposals, and I am deeply concerned by the number of fundamental technical gaps, missing information and inconsistencies in the application.

The Site Parameters Plan, one of only three drawings put forward for approval, contains no dimensions, heights, access points, parking numbers or key. No site layout plan, floor plans, elevations, external lighting layout, boundary or security fencing plan, or drainage layout has been provided. At least nine matters are left to be resolved after any permission is granted rather than assessed now, including the lighting scheme, the contamination investigation, the long-term power supply, and the long-term foul and surface water drainage solutions. All of these are fundamental requirements to be able to determine the viability of the site, and from an informal review of utility information in the area I understand that most are near capacity, with certainly insufficient resilience for the number of additional people noted in the proposal. Indeed, even as a resident, I can confirm that the water pressure in the village is poor, with a regular subject of discussion in the village being the lack of water pressure.

This is not how major infrastructure development should be assessed. Key technical matters cannot simply be deferred to post-consent conditions and still provide decision-makers with the evidence base they need to make an informed judgment.

Drainage, flood risk and utilities capacity – fundamental uncertainties

The applicant's own utilities assessment states that the condition, capacity and configuration of the electrical network serving the site are "currently unknown", and that the capacity of the primary intake "has not been verified. Because of this uncertainty, the applicant proposes to rely on temporary and permanent generators to meet an estimated maximum demand of around 2.16 MVA, rather than a confirmed grid

connection.
That is not a sustainable solution for a site with a stated minimum operational life of ten years. Relying on generators for heating, hot water and cooking for over a thousand people, with no confirmed grid capacity, is technically inadequate and environmentally unacceptable.
Similarly, the nearest wastewater treatment works serves a population equivalent of around 40,436 and has been upgraded to a design capacity of around 67,840. The applicant's own utilities assessment states that "potential headroom may exist but requires confirmation of capacity and permit compliance". There is no evidence that Thames Water has confirmed, in writing, that the network can accommodate this scale of additional demand. This is particularly relevant with the known local flooding of the river Ray that occurs for several months of the year in the area.
The applicant's own Flood Risk Assessment records that around a quarter of the site has a "high chance" of surface water flooding in any given year, with further areas at medium and low risk. The Environment Agency's standard surface water modelling does not take account of the site's own private drainage ditches and pipework, whose condition has not been surveyed. The drainage strategy needed to manage this risk is being prepared separately and had not been finalised at the time the Flood Risk Assessment was submitted.
As an engineer, I cannot understand how a decision can be made on a development of this scale without confirmed drainage capacity, confirmed power capacity, and a finalised flood mitigation strategy already in place and assessed.
Ground conditions and contamination – premature assessment
The site's history as a wartime ordnance depot means there is a realistic risk of unexploded ordnance and contamination, but the assessment carried out is a preliminary, desk-based risk assessment only – no intrusive ground investigation appears to have been carried out before the application was submitted. The applicant's own geo-environmental assessment identifies areas of the site historically used for handling and storing munitions, and flags asbestos-containing material as a further contamination risk in the made ground.
Standard engineering practice for a site of this history and sensitivity would require intrusive investigation before submission, not deferred to a post-consent condition. Contamination, if present, has direct implications for foundation design, drainage, landscaping, health and safety during construction, and the long-term suitability of the site for residential use. These are not matters that can be left to be "sorted out later".
This is also the case for the warehouses on site that are known to have asbestos-containing material in their construction. This is one of the most dangerous building materials known in this country, in buildings that are known to be at the end of their design life and therefore liable to fail, put under additional stress and potentially putting

the intended users and staff, as well as village residents as close as 150m away, as significant risk of life changing harm.

2. Pedestrian and wildlife safety – personal experience

I walk my dog along the footpath adjacent to the site every morning. There is a large amount of wildlife in and around the proposed site. I understand some initial assessments have been done but the applicant's own ecological assessment states that it cannot be considered a comprehensive assessment, and records that a number of protected species surveys remain outstanding. No biodiversity net gain assessment appears to have been produced, despite this being a standard requirement for developments of this kind. In addition to this, the [redacted] is heavily trafficked, and where a footway exists at all, it is roughly one metre wide. The Department for Transport's own inclusive design guidance, which the Transport Assessment says it has followed, recommends a minimum of two metres. Recorded traffic on the approach roads averages around 3,000 vehicles a day in each direction, with 85th percentile speeds of around 53–54 mph.

I have personally witnessed how unsafe this corridor is for pedestrians. Heavy vehicles pass within inches of the footway edge at speed. On several occasions I have had to step into the verge with my dog to avoid being struck. The idea that this route is suitable for an additional 1,256 people, many of whom will be walking or cycling to access shops, services and public transport, none of which are located nearby, is not credible.

The junction capacity modelling that concludes there is "plenty of spare capacity" carries the software's own warnings that heavy vehicle traffic was set to zero in three of the four modelled scenarios, despite this being a site expected to generate significant coach, minibus and delivery vehicle movements. As an engineer, I know that junction capacity models are only as good as the assumptions fed into them. If the assumptions do not reflect the reality of what the site will generate, the conclusions are worthless.

3. Inconsistencies and missing evidence

The application contains multiple internal inconsistencies that undermine confidence in its technical rigour:

• Some documents describe the site as vacant and non-operational; others describe it as leased and in active use for defence storage.

• Floorspace figures differ between documents (17,935 sqm in one, 17,350 sqm in another).

• The number of Nissen huts to be demolished is given as five in the Secretary of State's written statement, but the Drainage Design Statement records 24 Nissen and Romney sheds on site.

• The lowest site level is given as 62.29 metres above ordnance datum on the existing site plan, but as 64 metres in the heritage assessment.

These are not typographical errors. They suggest a lack of coordination and quality

control across the application documents, which raises serious questions about the reliability of the technical assessments as a whole.

4. The rushed process

I am also concerned about the procedure being used. There is no statutory requirement for public consultation under this fast-track procedure, no guaranteed minimum period for representations, and no requirement to notify neighbouring residents directly. Our property sits 172m from, and overlooks, Site A (the proposed development) and will be directly impacted. The Home Office's own factsheet states a minimum operational life of ten years for the site, and its own Statement of National Importance says that, over time, the site is intended to be expanded for use as a long-term asylum accommodation solution. That does not sound like a case of genuine urgent necessity.

A smaller accommodation centre (capped at 750 people) was proposed nearby in the early 2000s. Following a fourteen-day public inquiry, an independent Inspector found the location unsustainable, citing isolation, risk to community cohesion, and strain on local services – and identified pedestrian road safety as one of only three reasons given for recommending refusal. That earlier scheme was abandoned within about two years as uneconomic. The current proposal is for a larger number of people, at greater scale, built on a similar argument about urgent national need, yet with even less scrutiny. I understand the commercial undertaking required to make the significant changes from an uninhabited storage area to accommodation for 1200 people, to deal with contaminants and to provide sufficient protection to them from a busy road, etc. If it was uneconomic in its previous form twenty years ago it will be much economically viable now.

What I am asking for

I ask that the Parish Council robustly oppose this application and ensure that my technical and personal concerns are fully represented in its submission to the decision-maker. Specifically, I ask that:

• No decision be made until confirmed capacity for power, water supply, foul drainage and sewage treatment has been demonstrated in writing by the relevant network operators and service providers, including any spare capacity, inflation factors and other external impacts,

• No decision be made until a finalised, assessed flood risk and drainage strategy has been submitted, consulted on and approved,

• No decision be made until an intrusive ground investigation for contamination and unexploded ordnance has been completed, assessed and published.

• No decision be made until detailed drawings, including site layout, drainage layout, boundary treatment and lighting, have been submitted and assessed.

• The decision-maker be asked to clarify how technical matters of this magnitude can lawfully be deferred to post-consent conditions rather than assessed before

permission is granted.

I am copying this response directly to the Planning Inspectorate and to Cherwell District Council to ensure it is also treated as a formal representation.

Please acknowledge receipt of this objection and keep me informed of all further developments.

Yours faithfully,

[redacted], CEng MICE

[redacted], Piddington, [redacted]

44. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]
Date: 15 September 2026

[redacted]

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

15 September 2026

Crown Casework Team

Ministry of Housing, Communities and Local Government

2 Marsham Street

London

SW1P 4DF

By email, copied to Cherwell District Council Planning Department

Dear Sir or Madam,

Re: Consultation Response and Objection to Urgent Crown Development Application – Former Defence Storage and Distribution Centre, Site A, Bicester Garrison, Launton Road, Oxfordshire [redacted] (Ref: PCU/RARE/J1725/3378659)

1. Who We Are and Why We Are Writing

We are writing as private residents to object to the above application. This response is submitted in a personal capacity, as the owners and occupiers of [redacted], 5 Ludgershall Road, Piddington, which lies within the immediate vicinity of Site A. It is separate from, and additional to, any formal objection submitted by Piddington Parish Council.

By way of background, one of us ([redacted]) is a director of a multidisciplinary architectural, planning consultancy and building surveying practice, and works daily advising clients on planning applications, amendments and building control matters across England. We make no claim to any special status in bringing this objection; we write simply as neighbours of this site who happen to have a working, professional understanding of how planning applications of this kind are ordinarily tested. That understanding is precisely why we feel so strongly that this application should not proceed on the evidence currently before you, and why we have set out our concerns below in a structured way, with specific questions we would ask you to address before any decision is made.

2. Summary of Our Objection

Our objection centres on three matters, each of which we consider has been inadequately evidenced given the site's proximity to our village and our home:

• Ground 1: the risk of land contamination and pollution from a site with a long history of military storage use, assessed only by a preliminary desk study;

• Ground 2: flood risk, given the site's own recorded surface water flooding and Piddington's known history of flooding; and
• Ground 3: air quality, given that the evidence submitted addresses construction dust only, not the operational impact of housing up to 1,256 people so close to our village.

We ask that this application be refused, or that determination be deferred, until the evidence gaps identified below have been properly addressed. We set out our reasoning, and the specific questions we would ask you to answer before determining this application, in the sections that follow.

3. Ground One: Land Contamination and Pollution Risk

Site A was previously operated as a Defence Storage and Distribution Centre, used for the storage and release of stores surplus to military use. The only ground contamination evidence submitted with the application is a Preliminary Geo-Environmental and Geotechnical Assessment, and it is exactly that: a preliminary desk study, drawing on a third-party Groundsure report and historical British Geological Survey records, rather than any intrusive site investigation of the ground itself. No borehole or trial pit data from within the site boundary has been produced to confirm what, if anything, remains in the ground following decades of military storage use.

Given our home's proximity to the site, we are directly concerned that construction, demolition and future occupation could mobilise contamination that has never actually been tested for, whether into the air we breathe, the watercourses that drain from the site towards the village, or the wider rural land on which many of our neighbours' livelihoods depend. A desk study alone is not, in our view, sufficient evidence to rule this out for a scheme of this scale and this proximity to an inhabited village.

Questions we ask you to address before determination:

• Has any intrusive ground investigation (boreholes or trial pits) been carried out within the site boundary, and if not, why has the application been accepted for determination without one?
• What condition(s), if any, would be attached to secure such an investigation, and would its results be published and open to consultee scrutiny before or only after permission is granted?
• How will contamination risk to controlled waters and to nearby residential receptors, including our home, be assessed and mitigated before construction begins?

4. Ground Two: Flood Risk

The applicant's own Preliminary Geo-Environmental and Geotechnical Assessment records that parts of the site itself are at up to 1 in 30 year risk of surface water flooding, concentrated around the drainage channels that cross it. As residents of Piddington, we can say from direct, lived experience that the village and the lanes around it, including [redacted], already suffer from surface water flooding in heavy rainfall. A development of this scale, involving substantial demolition, new hardstanding and modular

construction across a site that is already known to flood, immediately upstream and adjacent to a village that also floods, is precisely the kind of proposal that would ordinarily require a detailed, site-specific flood risk assessment and a proven drainage strategy before permission could responsibly be granted.

Questions we ask you to address before determination:

• Has the drainage strategy been tested against the realistic combination of the site's own recorded flood risk and Piddington's known local flooding history, rather than assessed in isolation?

• Have the Lead Local Flood Authority and the relevant Internal Drainage Board been consulted, and if so, what concerns, if any, have they raised?

• Will the drainage strategy be fully agreed and approved before permission is granted, or only by condition afterwards, and if the latter, what safeguards exist should it later prove inadequate?

5. Ground Three: Air Quality

The air quality evidence submitted takes the form of a screening technical note assessing construction dust risk against the Institute of Air Quality Management's dust methodology. That is a world away from a proper assessment of the air quality impact of housing up to 1,256 people on this site on an ongoing, operational basis, including the associated vehicle movements, plant, generators and wastewater treatment infrastructure, all within close range of our homes and the wider village. We are concerned about the cumulative effect on the local atmosphere that we and our neighbours rely on for our health and quality of life.

Questions we ask you to address before determination:

• Will a full operational air quality assessment be required and made available for scrutiny before this application is determined, rather than a construction dust screening note alone?

• How will the cumulative, long-term air quality impact of a facility of this size, including traffic, plant and infrastructure, be assessed and mitigated?

6. Cumulative Impact on Our Village and Our Home

Piddington is a small, quiet rural community. Site A sits close enough to us that any of the above risks, contamination, flooding or air quality, would fall directly on our doorstep and on those of our neighbours, not on some distant, unaffected population. A facility for up to 1,256 people is a huge and permanent change of circumstance for a village of our size, and we do not believe the safe enjoyment of our homes, our health, or the rural livelihoods around us have been given the serious, evidenced consideration they deserve.

7. Why This Should Not Be Decided on the Evidence Currently Submitted

We want to be direct about why we feel compelled to write personally, in addition to any collective objection. In our professional experience of the planning system, an application with this scale of unresolved contamination, flood risk and air quality uncertainty, proposed this close to an inhabited village, would not succeed if it were brought forward through the

ordinary Town and Country Planning Act process, where full technical scrutiny, statutory consultation periods and the opportunity for independent testing of evidence are the norm. It is only because this application has been brought forward under the urgent Crown Development procedure, on a compressed timescale, that these gaps in the evidence base have not yet been tested in the way they ordinarily would be. We do not think the urgency of the wider policy objective should be allowed to excuse the absence of evidence that would, in any other circumstances, be required before a decision of this magnitude could properly be made.

8. Requested Outcome

We ask that this application be refused, or at the very least that determination be deferred until proper, site-specific evidence, including an intrusive ground investigation, a tested flood risk assessment reflecting both the site's and the village's known flooding history, and a full operational air quality assessment, has been obtained and made available for scrutiny. We would also ask that the specific questions set out above are answered directly, and that those answers are made available to us and to other consultees, before any decision is made.

We would be grateful for acknowledgement of this letter as a formal representation against the application, and we ask that it be taken fully into account, together with the specific questions raised, in the determination of PCU/RARE/J1725/3378659.

Yours faithfully,

[redacted] [redacted] BSc(Hons)

[redacted] [redacted]

[redacted], [redacted], Piddington, Oxfordshire, [redacted]

45. [redacted] (Dr)

Address: [redacted], Piddington, [redacted]
Date: 12th September 2026

Dr [redacted]
[redacted]
[redacted]
Piddington

12th of September 2026

To whom it may concern,

I am writing to formally object to the proposal to use the MOD site at Piddington to accommodate approximately 1,250 asylum seekers.

My family and I are residents of Piddington, with two daughters aged 9 and 16. Our objection is not directed at the prospective occupants of the site, who have no choice in the matter. Rather, our objection concerns the disproportionate scale of the proposal and the inadequacy of local infrastructure to support such a significant change.

1. The proposal is disproportionate

Piddington is a very small rural community of approximately 300 residents. Adding 1,250 additional people would more than quadruple the local population overnight. Based on the figures available to us, the proposed cohort includes approximately 120 women and 46 children, implying a resulting women-to-men ratio in the area of roughly 1:10 among the incoming population. This represents a substantial and, in our view, unacceptable change to the demographic balance and character of the village and surrounding area.

Proportionality should be a primary consideration in any such decision. The suitability of the site itself is not sufficient; the impact on the existing community, its infrastructure, and its capacity to absorb change of this scale must also be properly weighed.

2. Lack of local facilities and infrastructure

Piddington has no shop, no GP surgery, no public house, no meaningful bus service, and no facilities for entertainment or recreation. It is unclear how a village with this level of provision could meet the needs of an additional 1,250 people.

Any proposal of this nature should properly address: the availability and capacity of public transport; traffic and highway implications; pedestrian and road safety (including at night, given limited street lighting); access to shops and health facilities; and the impact on neighboring communities and the wider local area.

A site that is capable of accommodating people is not necessarily one that is socially, environmentally, or infrastructurally suitable for accommodating them at this scale.

3. Request of evidence

Before any decision is made, I request that the relevant authorities publish or otherwise make available the evidence and assessments underpinning the identification of Piddington as a suitable location, specifically addressing:

1. Highway and traffic impact;
2. Pedestrian and road safety;
3. Night-time pedestrian safety;
4. Public transport capacity;
5. Healthcare capacity;
6. Police and emergency service capacity;
7. Fire safety and emergency evacuation;
8. Safeguarding;
9. Waste and refuse management;
10. Water, sewage and other utilities;
11. Environmental impact;
12. Community cohesion;
13. Impact on neighboring settlements;
14. The cumulative impact of the proposed population increase; and
15. The basis on which accommodating approximately 1,250 people has been assessed as proportionate and appropriate for a community of approximately 300 existing residents.

I would further request that the operations manual for the site be shared, setting out how the needs of occupants will be met, including: mental health support, healthcare provision, utilities, catering, waste management and recycling, asbestos management, legionella management, and fire management.

I respectfully request that the proposal be reconsidered and refused, or that an alternative and more proportionate location be identified.

The issue is not about asylum seekers. The issue is whether it is reasonable or sustainable to place approximately 1,250 additional people in a small rural community of some 300 residents. A change of this magnitude requires substantially more than suitable buildings.

In the absence of compelling evidence that these matters have been properly assessed and adequately addressed, I believe there are serious grounds to conclude that the proposed site is unsuitable for accommodation on the scale proposed.

I therefore ask that this objection be formally recorded and fully considered before any decision is made.

Yours faithfully.

Dr [redacted]

46. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 14th September 2026

14th September 2026

To whom it may concern,

I am writing to express my strong objection to the proposed use of the Piddington MOD site for housing approximately 1,250 asylum seekers.

My family lives in Piddington, and as the parent of two young daughters, my objection focuses on the unsustainable scale of the project and the lack of local infrastructure. This is a matter of practical viability, not a grievance against the prospective residents.

The proposal is completely disproportionate to the host community. Piddington is a rural village of just 300 residents. Increasing the population fourfold overnight is unprecedented and unworkable. Additionally, the stark gender imbalance in the proposed demographic—where men will outnumber women 10 to 1—will drastically alter the character of our small village.

Furthermore, our village has zero infrastructure to support this influx. Piddington has no shops, no GP surgeries, no community hubs, and no viable public transport. The surrounding road networks are unlit and unsafe for heavy pedestrian use. The proposal provides no clear solutions for how transport, healthcare, road safety, or basic human needs will be managed without overwhelmed neighbouring communities.

An accommodation site must be logistically viable and socially sustainable. This proposal meets neither criterion.

I am writing to formally object to the proposal and request that it be refused, or that a more appropriate alternative site be found.

My concern is entirely on proportionality and sustainability. Increasing the population of a small rural community of 300 people by an additional 1,250 residents is an overwhelming change. A development of this scale requires a level of local infrastructure and support that goes far beyond the existence of standing buildings.

In the absence of a thorough impact assessment proving these challenges can be managed, the site is clearly unsuitable for this level of occupancy.

I request that these comments be formally noted and addressed during the decision-making process.

Yours faithfully,

Mr [redacted]

[redacted]

[redacted]

Piddington

47. [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 10 September 2026

PCU/RARE/C3105/3378843

Formal objection to MOD Bicester Site A

Urgent Crown Development application PCU/RARE/C3105/3378843

To: Secretary of State for Housing, Communities and Local Government, via the Crown Casework Team

By email: Crowncasework@communities.gov.uk

From: [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]

Email: [redacted]

Date: 10th September 2026

Dear Secretary of State,

1 My objection

1.1 I object to this application and ask the Secretary of State to refuse full planning permission. It seeks a ten-year development accommodating up to 1,256 people. The published evidence does not establish that the scheme, at its maximum scale and through all phases, can operate acceptably at this location. If permission is not refused, determination should be deferred while the essential evidence identified below is obtained and consulted upon. [D0]

1.2 I live in Piddington with my family. I want to understand how the proposed development would affect our village, local services and the surrounding environment. I recognise the need for suitable asylum accommodation, but I remain concerned that the published documents leave important questions about this site unanswered.

1.3 Paragraph 5.8 of the Planning Proposal Statement relies on the December 2024 National Planning Policy Framework (NPPF) as amended in February 2025. A replacement NPPF was published on 17 August 2026; Annex A, paragraph 1 makes it a material consideration from publication. Please assess the proposal under the current framework and identify the relevant development-plan policies, their weight and any justified departure under section 38(6). Reliance on the earlier policy analysis without updating it would be inadequate. [D1] [L6] [L9]

2 Ecology and outstanding surveys

2.1 The applicant expressly identifies outstanding work. Planning Statement paragraphs 7.34-7.35 list surveys or further assessments for dormice, roosting and other bats, breeding birds, great crested newts and reptiles, with the results intended to inform design, mitigation and licensing. The Preliminary Ecological Appraisal identifies the limitations of a single visit and says its assessment is not comprehensive. [D1] [D2]

2.2 Natural England's standing advice says necessary surveys should be received before deciding an application, and surveys should not usually be left to conditions. It recognises exceptions, including additional or updated surveys to support mitigation, and justified alternative licensing

approaches. The decision must explain any exception relied upon here. General urgency does not itself establish that a species-specific assessment or licensing approach is adequate. [L5]

2.3 The survey findings could change the design of the scheme. Survey results may affect the developable area, demolition, tree retention, lighting, ecological connections and the space required for mitigation. Please require the necessary survey results and an integrated ecological impact assessment before granting permission. If equivalent evidence or a justified alternative approach is relied upon, publish it and explain how it addresses each outstanding recommendation.

2.4 R (Woolley) v Cheshire East Borough Council [2009] EWHC 1227 (Admin), paragraphs 27-35, supports substantive consideration of protected-species requirements at the planning stage. It must be read with Morge v Hampshire County Council [2011] UKSC 2, paragraphs 29-30, which limits the planning authority's role in duplicating licensing judgments and recognises reliance on Natural England's advice. I do not suggest that species presence automatically prevents permission. Please identify the evidence and advice supporting the proposed approach to the outstanding surveys and any necessary licences. [C1] [C2]

3 Drainage and Arncott Bridge Meadows

3.1 The Drainage Design Statement records reports of frequent surface-water flooding affecting Zone 1 and much of the southern access. Section 9.1 says the viability of its proposals has not been determined. Sections 11.1-11.2 describe a concept requiring further investigation, including outfalls, receiving watercourses, hydraulic modelling and the viable foul-water solution. These are material uncertainties about whether the development can be safely served. [D3]

3.2 Natural England's letter of 23 July 2026 says it had not seen the drainage details and was advising on an email. It identifies possible significant effects on Arncott Bridge Meadows Site of Special Scientific Interest (SSSI), requests adequate water-quality treatment and further consultation, and states that its discretionary advice is not a binding statutory response. [D4]

3.3 I acknowledge the screening statement records further Natural England advice on 11 and 13 August, including support for the proposal moving forward without damage. That later advice needs to be read alongside the July letter. Please publish the later advice, the information supplied with it, and the resulting requirements so that its scope can be understood. [D5]

3.4 Section 8.2 of the Drainage Design Statement (PDF page 23) says Phase 1 lacks space for attenuation and its flows cannot be restricted to greenfield rates. It also proposes approximately 440 square metres of concrete surfacing within an existing gravel corridor, without greenfield runoff control for that area. Yet the screening written statement (PDF page 10) relies on greenfield discharge rates, no alteration of the existing hydrological regime and no additional hardstanding. These are specific matters requiring reconciliation, beyond the report's recommendation to explore betterment rather than a strict greenfield limit for all areas. [D3] [D5]

3.5 Please identify the operative design, whether a later revision supersedes section 8.2, and whether Natural England's August advice considered the Phase 1 exception and concrete surfacing. Existing gravel may already count as hardstanding; that does not answer whether the change in impermeability affects runoff. Publish the hydraulic and ecological evidence supporting the screening conclusion for each phase, with the lead local flood authority's response. A clarification may resolve these discrepancies, but their environmental significance must be established before the decision relies on the disputed assumptions.

3.6 Before permission, require sufficient evidence of a deliverable drainage solution: verified receiving routes and capacity; modelling of flood and pollution effects; safe access during flooding; pump or power-failure contingencies; and a feasible foul-water destination for each phase. Identify the necessary land rights, treatment capacity and maintenance responsibility. Apply NPPF F4-F8, explaining any sequential-test exemption relied upon. I am asking for evidence that the drainage solution will work, while recognising that some construction details can follow later. [L6]

3.7 The decision should demonstrate compliance with the qualified conservation duty in section 28G of the Wildlife and Countryside Act 1981. Where section 28I is engaged, confirm its notice, advice and timing requirements have been met. These duties are separate from environmental impact assessment screening. [L4] [L12] Under NPPF policy N6(1)(b), identify whether the case rests on no adverse effect, the specified benefits balance, or an applicable Environmental Delivery Plan and levy commitment. Do not assume an exemption. [L6]

4 Environmental impact assessment

4.1 Please treat this representation also as a request under regulation 5(6)(b) of the Environmental Impact Assessment (EIA) Regulations 2017 to reconsider the direction of 26 August 2026, reference PCU/EIASCR/C3105/3378828, and issue a fresh direction. Its adequacy must be examined against the actual scheme now proposed and the unresolved matters identified here. [D11] [L3]

4.2 The screening statement asserts no additional hardstanding and no loss or harm to Priority Habitat. However, the screening request identifies potential construction losses including deciduous woodland and lowland meadow. These accounts need reconciliation by reference to the surveyed baseline and an enforceable footprint. A later design may resolve the discrepancy; the published material should explain whether and how it has done so. [D5] [D6]

4.3 Mitigation may lawfully be considered at EIA screening. The objection is therefore not that it has been considered, but whether the measures relied upon are sufficiently identified and credible. Regulation 5 and Schedule 3 require examination of the whole development and relevant environmental sensitivities, cumulative effects and the possibility of effectively reducing impacts. The accompanying guidance also addresses how those measures should be secured. [L3] [L10]

4.4 In R (Champion) v North Norfolk District Council [2015] UKSC 52, paragraphs 51-53, the Supreme Court explained that mitigation can be considered at screening, but material doubt generally favours EIA. Not every uncertainty requires EIA. The Court also refused relief on the facts after considering the investigations, consultation and evidence (paragraphs 58-60). I rely on its requirement for an informed screening judgment, not on a claim that every defect requires quashing. Please explain how the unresolved matters in section 3 are consistent with a sound conclusion that significant effects are unlikely. [C3]

4.5 The common-law duty in Secretary of State for Education and Science v Tameside MBC [1977] AC 1014 requires reasonable steps to obtain the information needed for the decision. R (Plantagenet Alliance Ltd) v Secretary of State for Justice [2014] EWHC 1662 (Admin), paragraphs 99-100, restates that duty and its demanding review threshold. These questions go to the basis of the screening decision. The conflicting drainage assumptions concern mitigation used to exclude significant effects; please establish which assumptions are correct and whether the necessary measures are feasible. [C4]

4.6 Please explain why significant effects are unlikely despite the unresolved drainage feasibility, design-informing ecological work and transport omissions set out in this representation. Identify the specific evidence supporting each conclusion and the controls that would keep the permitted

scheme within the assessed assumptions. A general undertaking to produce an acceptable design later does not answer those questions.

4.7 I ask for a positive screening direction and an Environmental Statement addressing the whole project. If the Secretary of State maintains the negative direction, please give a reasoned response to these specific discrepancies. If this is EIA development, regulation 3 prevents permission without EIA and article 11(3)(c) of the urgent procedure provides for a representation deadline no earlier than the end of its 30-day publication period. [L3] [L2]

5 Road safety and transport

5.1 The Transport Assessment records a 50mph Thame Road, no footways or street lighting immediately around the northern access, and recommends minibuses because of limited pedestrian infrastructure. It cannot accurately estimate construction traffic at paragraph 5.2.3. The screening statement says shuttle-bus movements for off-site facilities have not been estimated. [D7] [D5]

5.2 The Equality Impact Assessment confirms residents can leave at any time, but describes shuttle buses as something that may be considered. This requires reconciliation with the transport assessment's reliance on their provision. A non-detained site cannot be assessed on an assumption that everyone will remain within it or use managed transport for every journey. [D8]

5.3 Require a consistent transport model covering full occupancy, realistic pedestrian and cycle demand, shuttle frequency and capacity, staff and servicing movements, and any additional tankering. Test construction peaks alongside occupation of earlier phases, disruption to shuttle provision and movements outside commuter peaks. Paragraph 6.3.2 excludes committed developments from the transport assessment; please publish and validate the search and exclusions underpinning that decision. [D7]

5.4 An absence of historic pedestrian collisions does not establish safety for the proposed pattern of use. Require a proportionate road-safety assessment and deliverable safe access before occupation. NPPF TR6 distinguishes unacceptable highway-safety effects from severe capacity or congestion effects and applies to construction and operation; TR3 and TR4 are also relevant. My concern is whether the assessment demonstrates that the proposed traffic and pedestrian movements can be accommodated safely. [L6]

6 Design details and planning conditions

6.1 Paragraph 1.9 of the Planning Statement adopts a Rochdale Envelope approach and anticipates later design approvals through conditions. The Site Parameters Plan provides a 12m height limit above existing site levels. A parameter-based full application can be lawful; the issue is whether its parameters and assessments adequately control this scheme. [D1] [D10]

6.2 Article 6(1)(c)(ii) requires the information necessary to describe the proposed development. Please demonstrate how the binding plans and conditions would prevent layouts, clearance, hardstanding, drainage infrastructure or occupation exceeding the impacts assessed. Provide an integrated plan showing that the maximum accommodation, access, servicing, drainage and ecological requirements can coexist. If they cannot, the scheme must be amended and reassessed. [L2]

6.3 Further-detail conditions are available, but their use needs justification; materially different development should not emerge through discharge of conditions. For any deferred off-site

infrastructure, establish realistic delivery prospects rather than relying solely on an agreement to seek third-party consent. Apply NPPF DM6 and the guidance on further details and conditions involving third-party works. [L6] [L11]

6.4 If any permission is time-limited, its commencement, cessation and restoration requirements must be unambiguous. A ten-year operational review must not substitute for a binding expiry. Identify what must be removed or restored, by when, and how that is secured.

7 Healthcare and equality impacts

7.1 The Equality Impact Assessment relies on on-site primary care to reduce pressure on existing provision but states that the exact service remains under discussion with local health authorities. Space reserved for healthcare does not by itself establish a staffed, funded service. [D8]

7.2 Please obtain and publish an assessment from the relevant NHS commissioning body of demand, proposed on-site capacity and residual impacts on local primary, mental-health, urgent and emergency care. Identify how provision begins with first occupation and scales with each phase. Any material reliance on these services should be backed by credible delivery arrangements and, where lawful and necessary, planning controls.

7.3 Section 149 of the Equality Act 2010 requires the decision-maker to have due regard to the specified equality needs in exercising this function. Please explain the implications of the transport and service model for disabled people and other affected groups, including future residents. The assessment must address foreseeable effects, with evidence for the mitigation relied upon. [L8]

7.4 In R (Hough) v Secretary of State for the Home Department [2022] EWHC 1635 (Admin), paragraphs 99-110, the court found a public-sector equality duty breach concerning Napier Barracks. The assessment addressed approximately two months' use, whereas the decision permitted five years; longer-term community relations, service pressures and possible mitigation had not been adequately considered. At paragraphs 111-114, the court rejected the contention that correcting the failure would necessarily make no material difference. This was a fact-specific decision, not a prohibition on asylum accommodation. [C5]

7.5 Please demonstrate that the material before the decision-maker addresses equality impacts throughout the proposed ten-year use, including the ability of local services to support it and the delivery of mitigation from first occupation. The unresolved healthcare provision identified at paragraph 7.1 makes this an important inquiry, but is not itself proof of a Hough-type breach. A commitment to review impacts later should supplement, rather than replace, the consideration required for the present decision. [D8] [L8]

8 The timetable and urgency

8.1 Section 293B(6) makes national importance and urgent need distinct requirements for accepting this route. The ministerial statement requires an accelerated operational timetable unlikely to be achievable through other application routes, with evidence of the consequences of not securing a timely decision. [L1] [L7]

8.2 The applicant's urgency statement assumes July submission and approval by late August 2026. The application was validated on 2 September; its published representation period ends on 17 September. Separately, the Transport Assessment uses 2027 as its assumed opening year. Those dates may reflect different phases, but the relationship needs an updated explanation. [D9] [D0] [D7]

8.3 Please publish a current programme showing how the outstanding ecological work, drainage solution, procurement and pre-commencement requirements affect each phase's opening date. Explain the actual timing advantage over the ordinary Crown route and the evidenced consequences of delay. The missed programme does not automatically extinguish urgency, but reliance on it without explanation would not answer the present question. Please reconsider the justification for continued accelerated handling in light of that evidence.

8.4 I recognise that the challenges concerning Wethersfield and Scampton in R (Clarke-Holland and others) v Secretary of State for the Home Department and another [2023] EWHC 3140 (Admin) were unsuccessful. That case concerned a different planning route and does not determine this application. My objections depend on Bicester's evidence, duration and proposed controls, rather than an assertion that urgent asylum accommodation is inherently unlawful. [C6]

9 Consultation and access to information

9.1 I request an extension of the current representation period and a further opportunity to comment on material new evidence or revisions before determination. The purpose is to allow informed responses to the ecology, drainage, transport and service evidence needed to decide the proposal. This objection is submitted within the published period and is not conditional on an extension being granted.

9.2 Article 10 allows the Secretary of State to set the non-EIA representation period. Once published, determination cannot precede its end and timely representations must be considered. Please confirm compliance with the separate consultation requirements in articles 13 and 15 and publish relevant responses promptly. I request an opportunity to address any response that introduces material evidence on which permission may depend. [L2]

9.3 I recognise the statutory protection for genuinely sensitive information. Please provide a public schedule identifying the material withheld and sufficient non-sensitive explanation of environmental assumptions and safeguards to permit meaningful comment, so far as consistent with section 293B(11) and article 12. I do not seek disclosure of security-sensitive operational details. [L1] [L2]

10 What I am asking for

10.1 The application should be refused because the material currently published does not demonstrate an acceptable, deliverable scheme. If the Secretary of State considers these matters capable of resolution, I request the following before any permission is granted:

a. Use the power in section 293B(8) to obtain the information necessary to resolve the ecological, drainage, transport and service issues identified above that could affect the design. [L1]

b. Reconsider the EIA screening direction in light of the Phase 1 runoff and surfacing discrepancies and the authorities cited above; require an Environmental Statement and the applicable consultation process if the proposal is EIA development.

c. Obtain current advice from Natural England, the Environment Agency, the highway and flood authorities, and the relevant NHS body on the evidence within their remits. Publish the August Natural England advice and the design information on which it was based, subject to lawful protection of sensitive information.

d. Publish material further evidence and scheme revisions and allow a meaningful further representation period; provide an updated assessment against current planning policy.

e. Explain any continued reliance on urgent handling and identify the binding plans, conditions and obligations that would secure every measure essential to an acceptable outcome.

10.2 Please ensure the decision and reasons address the principal objections above, rather than relying on a general assertion that concerns can be dealt with by conditions. If the necessary evidence remains unavailable, that is a reason not to grant permission. It should not become a reason to postpone scrutiny until after permission has been given.

Yours faithfully,

[redacted]

References

PDF page references count from the first page of the published file and may differ from printed page numbers. Sources checked on 10 September 2026. Bracketed references in the body and the titles below are clickable.

D0 Official application page - Application PCU/RARE/C3105/3378843; publication, validation and representation dates.

D1 Planning Proposal Statement - Paragraphs 1.9, 5.8 and 7.34-7.35; PDF pages 8, 40 and 72-73.

D2 Preliminary Ecological Appraisal - Limitations and section 5 conclusions; PDF pages 11 and 36.

D3 Drainage Design Statement - Existing flooding, section 8.2 runoff and surfacing, foul drainage and conclusions; PDF pages 12, 23, 28 and 36-37.

D4 Natural England drainage advice dated 23 July 2026 - DAS/A024337; drainage evidence, further consultation and status of advice; PDF pages 1-2.

D5 EIA screening direction written statement - Traffic and duration, drainage assumptions and later Natural England advice; PDF pages 3 and 9-11.

D6 EIA screening direction request - Ecological construction effects and potential habitat loss; PDF page 38.

D7 Transport Assessment - Paragraphs 3.3.1-3.4.4, 5.2.3-5.2.4, 6.1.2 and 6.3.2; PDF pages 16-18, 33 and 40.

D8 Equality Impact Assessment - Community relations and local services; PDF pages 16-17.

D9 Statement of National Importance - Alternative routes and urgency programme; PDF page 5.

D10 Site Parameters Plan - Drawing BIC-DR-AR-100107-P01; operational development zone height limit of 12m.

D11 EIA screening direction dated 26 August 2026 - Reference PCU/EIASCR/C3105/3378828.

L1 Town and Country Planning Act 1990 section 293B - Subsections (6), (8) and (11): acceptance, further information and sensitive information.

L2 Urgent Crown Applications Procedure Order 2025 - SI 2025/411; articles 6, 9-13 and 15.

L3 Environmental Impact Assessment Regulations 2017 - Regulations 3 and 5, and Schedule 3.

L4 Wildlife and Countryside Act 1981 section 28G - Qualified duty to further conservation and enhancement of SSSIs.

L5 Natural England protected species standing advice - Sections 1 and 2, including planning conditions; updated 7 April 2025.

L6 National Planning Policy Framework August 2026 - Annex A paragraph 1; policies DM6, TR3, TR4, TR6, F4-F8, N2 and N6.

L7 Crown Development Written Ministerial Statement - HCWS454, 13 February 2025; national importance and urgent operational need.

L8 Equality Act 2010 section 149 - Public sector equality duty.

L9 Planning and Compulsory Purchase Act 2004 section 38 - Subsection (6): development plan and material considerations.

L10 Planning practice guidance on EIA - Paragraph 018: reasons for negative screening and securing avoidance measures.

L11 Planning practice guidance on conditions - Paragraphs 006, 009 and 012: further details, third-party works and significant changes.

L12 Wildlife and Countryside Act 1981 section 28I - Notice, consultation and timing when authorising operations likely to damage a SSSI.

Case law

C1 R Woolley v Cheshire East Borough Council [2009] EWHC 1227 (Admin) - Paragraphs 27-35: consideration of protected-species requirements at the planning stage. Read alongside the later Supreme Court decision in Morge.

C2 Morge v Hampshire County Council [2011] UKSC 2 - Paragraphs 29-30: limits of the planning authority's licensing role and reliance on Natural England's advice.

C3 R Champion v North Norfolk District Council [2015] UKSC 52 - Paragraphs 51-53: mitigation, uncertainty and EIA screening. Paragraphs 58-60: discretion to refuse relief in the circumstances of that case.

C4 R Plantagenet Alliance Ltd v Secretary of State for Justice [2014] EWHC 1662 (Admin) - Paragraphs 99-100 restate the duty of reasonable inquiry from Secretary of State for Education and Science v Tameside MBC [1977] AC 1014, page 1065.

C5 R Hough v Secretary of State for the Home Department [2022] EWHC 1635 (Admin) - Paragraphs 99-110: inadequate assessment of longer-term equality impacts at Napier Barracks. Paragraphs 111-114: rejection of the no-difference argument.

C6 R Clarke-Holland and others v Secretary of State for the Home Department and another [2023] EWHC 3140 (Admin) - Paragraphs 103-114 and 120: unsuccessful equality and other challenges concerning Wethersfield and Scampton; distinction from Hough. The planning route differed from this application.

48. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 14 September 2026

FORMAL OBJECTION – MOD BICESTER SITE A

Dear Crown Development Casework Unit

I am a resident of, and farmer in Piddington. I write to you to formally object to the planning application PCU/RARE/C3105/3378843 (proposed 1,256-person asylum accommodation centre at Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, [redacted].)

I wish to state that my objection to the use of this site is not an objection to people seeking asylum. It is not a political objection. It is an objection to the size of the development, its suitability and to the effect on myself, the surrounding area and people to be housed there.

I am a livestock farmer using many fields within and around Piddington. This application concerns me because it has been handled under the fast track ‘’urgent Crown development procedure ordinarily reserved for matters of genuine national emergency. The application itself contains many sections which do not give answers to questions and do not refer to surveys carried out to inform the plans.

The application form confirms that the site will be used for a capacity of 1256 bedspaces all for single adult men. 1256 people is more than four times the entire recorded population of Piddington itself and close to the combined population of Piddington, Upper and Lower Arncott and Blackthorn combined.

The application form records the proposed site as C2A class- Secure Residential Institutions, the same class as prisons and detention centres. Yet the Home Office is repeatedly stating that the site is ‘’non-detained’’ and these residents ‘’free to come and go’’.

So where will they go? This is a quiet rural community the village of Piddington has no amenities, lighting or pavements. My farmland is most likely to suddenly have groups of men walking across it looking for somewhere to go and something to do. As a single person, usually working in the farmyard or the fields alone, the worry of this especially during lambing and calving is already having an impact on my mental health. I am very concerned about the disturbance of my animals in fields and barns. These men will be able to roam around day or night.

The application document does not include a site layout plan, floor plans, elevations, external lighting layout, boundary, security fencing plan, or drainage layout. There appears to be only a desk – based assessment of any contamination on a site which is in fact a former Army ordinance depot with Nissan huts, Romney sheds, rail sidings and a history of handling munitions. Surely due to this ground

investigations should be carried out before the site is considered at all as a suitable place for 1256 men to live.

Water pressure in my fields and barns is already low and thirsty animals during the summer highlighted this. There is no evidence that Thames Water have assessed and confirmed in writing that they have the capacity to accommodate the extra demand the site and residents will put on the system. Likewise plans for removal of waste water from the site does not appear to have been clearly planned by the applicant whose own foul drainage strategy is described as ‘provisional’ pending further surveys. Surely these should be in place before the application to house this many residents is considered.

The site is prone to flooding often and the applicant acknowledges that a quarter of the site has a ‘high chance of flooding in any given year.’ This is an area with several SSI sites close by. These fields flood regularly and take ground water from the local area. There does not appear to be any consultation regarding the chance of contamination of these fields or the River Ray Catchment area.

These fields are important to me as a local farmer who grazes animals and makes animal fodder on them.

In the application the applicant states that they have not carried out comprehensive ecology assessments and that many of its surveys remain outstanding. Natural England concerns and correspondence has not ben published.

The noise, light pollution and overwhelming changes to this site will affect all the species which live in and around it as well as the local village of Piddington and the surrounding countryside. The noise from the generator suggested for electricity will also impact on the lives of those residing and working on the site.

The site entrance is on the Thame Road. This is a road I use frequently and it is fast and always very busy.

There are no footpaths, no street lights and often accidents. Widnell Lane, which I travel regularly in a car and with tractors and implements, along with all other roads around the site and in the local area are narrow, rural roads with no footpaths or lighting.

In the application the transport Assessment details traffic and speed data from a road in Essex. Surely an accurate assessment of the roads in this area is required before this application is considered to be in a suitable location.

Overall, taking this application into account, I do not feel it considers the health and safety, equality,

and wellbeing of its residents, the residents of the existing Traveller site 150meters away or of the residents of Piddington and other villages nearby.

I do not believe relevant surveys, assessments and plans have been studied or used by the applicant in consideration of their application. The are many details required which have been ignored.

I feel strongly that these must be resolved and offered into the public domain before this application for development on what I consider to be the wrong site with the wrong plan is considered.

I therefore request that planning permission is NOT approved.

I would be grateful if this objection could be placed on the official case file and considered when the application is determined.

Application Reference PCU/RARE/C3105/3378843

[redacted],

Manor Fram,

Piddington,

[redacted]

Date 14 September 2026.

49. [redacted]

Address: [redacted], [redacted], [redacted], Piddington, [redacted]
Date: 09.09.26

Objection to Site A, MOD Bicester

Application reference: PCU/RARE/C3105/3378843

Dear Sir/Madam,

I wish to formally object to the proposed development at Site A, MOD Bicester, application reference PCU/RARE/C3105/3378843.

I am not objecting simply because I do not want this development in my area. I am someone whose family life, ability to use our land, animals and financial interests will be directly and seriously affected by this proposal.

The direct impact on our smallholding

Our family has farmed and cared for animals on our smallholding for many years. Our smallholding is less than a two-minute walk from the proposed entrance to Site A.

I drive to the smallholding, but once there I have to get out of my vehicle and open a large gate to access our land. We have to do this twice every day, every day, in order to care for our animals.

This is not an occasional hobby. It is an established part of our family's life.

My husband, my daughter, my son at times and I all help care for our animals. In particular, my daughter has her own flock of sheep, which she takes responsibility for. She has grown up learning how to care for them and taking pride in being responsible for their welfare.

The smallholding is an important part of our family life and has been for many years.

I am now faced with the extremely difficult possibility that I may no longer be able to continue keeping our animals there because of the impact this development will have on my ability to safely access and use our land.

That is an incredibly upsetting position for my family to be put in.

My safety and the safety of my daughter

I am particularly concerned about the impact this development will have on women and girls using the area.

Although I drive to the smallholding, I have to get out of my vehicle and open a large gate in order to enter our land. I currently do this twice a day, every day.

I am now seriously concerned that I will no longer feel safe doing this on my own. I would also no longer feel comfortable taking my daughter to the smallholding on my own.

This is not because I am making assumptions about the individuals who may be accommodated at Site A. It is because the location is already isolated, and a development of this scale immediately beside our land will fundamentally alter the circumstances in which I currently access and use it.

I should not have to feel that I need another adult with me simply to get out of my vehicle, open the gate and access our own smallholding.

Women and girls should be able to access their own land and use the surrounding roads without feeling that they cannot do so safely.

I am therefore deeply concerned that the impact of this proposal on the safety and wellbeing of women and girls living and working immediately around the site has not been adequately considered.

The Parish Council's evidence also identifies safeguarding and welfare concerns associated with the site's isolated location and stresses that such risks should be properly assessed before people are accommodated there.

The impact on my daughter

The impact on my daughter is particularly upsetting to me.

She has her own flock of sheep and has taken responsibility for caring for them. This gives her responsibility, independence and a connection with the land and animals.

If I no longer feel able to safely take her to the smallholding, she will lose something that has been a fundamental part of her life.

She is potentially being asked to lose an important part of her childhood because of a development that we did not ask for and which is being placed immediately beside our land.

I appreciate that planning decisions have to be based on planning considerations rather than emotion. However, I believe the personal impact is relevant because it demonstrates the real-world consequences of placing such a large development in this particular location.

Highway and pedestrian safety

I am also extremely concerned about highway and pedestrian safety.

I know these roads extremely well because we use them regularly to access our land.

There are several bad bends along the road and, when walkers or runners are using it, there is not always sufficient room for them to move safely away from traffic. In my experience, pedestrians frequently remain on the road rather than being able to move onto the grass when traffic is approaching from the opposite direction.

This is a real concern to me because of how frequently my family uses this road.

The Parish Council's evidence identifies traffic levels of around 3,000 vehicles a day in each direction, with 85th percentile speeds of approximately 53–54 mph, and footways of approximately one metre where they exist.

There are also significant concerns about the transport assessment itself, including the use of data transferred from another road in Essex and the absence of a traffic count, collision search and safety assessment for Widnell Lane, which is the direct route towards Piddington.

There have already been fatalities on the wider road corridor. This makes it even more important that highway and pedestrian safety is properly assessed rather than relying on assumptions that the existing roads are adequate.

I strongly object to this proposal proceeding without a proper, site-specific and robust assessment of pedestrian and highway safety, particularly for the roads used by local

residents accessing their homes, farms and smallholdings.

The scale of the development

The sheer scale of this proposal is also extremely concerning.

The application proposes accommodation for up to 1,256 single adult men. The Parish Council's evidence points out that this is more than four times the recorded population of Piddington itself.

For my family, this is not simply a number on a planning document.

It means potentially 1,256 additional people being accommodated immediately beside land which we have to access twice every day.

The site is already in an isolated rural location. A development of this scale will fundamentally change the environment around our smallholding and the way in which we are able to use our own land.

Financial impact and potential loss of our land's value

There is also a significant financial impact on our family which I feel has not been properly considered.

Our smallholding has been part of our family life for many years. We have invested considerable time, money and effort into maintaining the land, keeping animals and making the smallholding work for our family.

If the proposed development means that I can no longer safely access and use the land, we may have no choice but to give up our animals and potentially the use of the smallholding altogether.

That would represent a substantial financial loss to our family, as well as the loss of something we have worked hard to establish over many years.

I am also extremely concerned about the potential impact on the value and marketability of our land.

Our smallholding is less than a two-minute walk from the proposed entrance to Site A. A development of this scale immediately beside our land, together with the associated traffic, activity, lighting, security infrastructure and change to the character of the surrounding area, could materially affect the attractiveness and value of our land.

We have invested in this land over many years and it forms an important part of our family's assets as well as our way of life.

The possibility that its value could be adversely affected through no fault of our own is deeply concerning.

We could potentially face both the loss of our established use of the land and a reduction in its value or marketability.

I believe the impact on neighbouring landowners, farms and smallholdings needs to be properly considered when assessing the suitability of this proposal.

Lack of proper consultation and assessment

I am also deeply concerned about the way this proposal is being progressed and the lack of

meaningful opportunity for people who will be directly affected to have their concerns properly considered.

The Parish Council's guide explains that the application is being dealt with under the urgent Crown development procedure, under which there is no statutory requirement for public consultation. It also records that Cherwell District Council stated that it had not been consulted before the site was publicly announced.

I find it extremely difficult to accept that a development of this scale, immediately affecting existing residents, farms and smallholdings, can be progressed without proper consideration of the people who are going to have to live with its consequences.

There also appear to be significant gaps in the application information. The Parish Council's evidence identifies missing or incomplete information concerning matters including site layout, lighting, fencing and security, drainage and infrastructure, with a number of matters apparently being left to be resolved after permission is granted.

How can residents who will be directly affected properly understand or assess the consequences of this development when important details have not yet been provided?

Conclusion

I strongly object to this proposal.

For my family, this is not an abstract planning application.

It potentially means losing the ability to safely access our own smallholding, giving up animals that have been part of our family life for many years, my daughter losing her own flock of sheep and an important part of her childhood, and potentially suffering a significant financial loss through the loss of our established use of the land and the possible reduction in its value and marketability.

We have lived and farmed in this area for many years. We have invested in our land and built our family life around it.

We have not asked for this development, yet we are potentially being placed in a position where we have to change or give up an important part of our family's way of life because of a development being located immediately beside our land.

I do not believe that the impact on my family, our smallholding, our animals, our ability to safely access our land, or the potential financial consequences have been properly considered.

I therefore ask that the decision-maker gives particular consideration to:

• the extremely close proximity of our smallholding to the proposed Site A entrance;
• our requirement to access the land twice every day;
• the safety and security concerns affecting me and my daughter;
• the impact on women and girls using this isolated rural area;
• the potential loss of our animals and established smallholding use;
• the impact on my daughter's ability to continue caring for her own sheep;
• highway and pedestrian safety;

• the existing road layout, bends, traffic speeds and pedestrian conditions;
• the serious road-safety history in the area;
• the enormous scale of the proposed development;
• the potential financial loss to our family;
• the potential impact on the value and marketability of our land;
• the gaps and inconsistencies within the application;
• and the lack of meaningful consultation and proper assessment of the consequences for immediately neighbouring land users.

For all of these reasons, I respectfully ask that application PCU/RARE/C3105/3378843 be refused.

Yours faithfully,

[redacted]

[redacted], [redacted], [redacted], Piddington

[redacted]

09.09.26

50. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 10 September 2026

[redacted]

[redacted]

Piddington

[redacted]

Thursday 10th September 2026

Dear Sir/Madam,

RE: Application reference: PCU/RARE/C3105/3378843

I am writing to object to the proposed development at Site A, MOD Bicester. This process has been handled using a fast-track 'urgent crown development' procedure. Something only used for a national emergency. This has meant that neither the villagers, the wider community of Piddington, other local villages or has Cherwell District Council have been consulted. We knew nothing about this until it was publicly announced. With national expenditure on asylum accommodation falling, how can this be considered a national emergency? In the application there are twelve paragraphs with heavily redacted sections. What information are they not giving us access to?

My principal concerns relate to the ecological value and incomplete assessment of the site, the significant lack of confirmed infrastructure capacity, the unresolved requirements for water, sewage and electricity, and the associated financial and environmental implications. I am also concerned that the flood risk associated with the site has not been adequately addressed.

Ecology, Bats and Biodiversity

The ecological implications of developing this site at the proposed scale requires much greater consideration. Four species of bats have been identified at Site A: Barbastelle (rare), Noctule, Pipistrelle 45, and Long-Eared bats. Under English law It is an offence to deliberately kill, injure, capture or disturb bats, and to damage or destroy their breeding sites or resting places. Protection can apply even when bats are not actually present at the time work takes place.

Local wildlife records identify 10 UK Red List birds including: Nightingales recorded singing and breeding for three consecutive years, [SPECIES], Cuckoo, Woodcock, Greenfinch, Starling and Linnet. There are a further 14 Amber List species; breeding Barn Owls; seven species of migratory warbler, The applicant's own Preliminary Ecological Appraisal states that it cannot be considered a comprehensive assessment, with a number of protected species surveys still outstanding. The fieldwork was undertaken between March 26th and April - not the optimum survey periods, with some buildings not adequately looked at and some areas ignored.

The site therefore provides an important habitat for legally protected mammals, and any assessment of the proposal needs to properly consider how construction and subsequent occupation could affect these species, surveys that must be conducted, published and independently scrutinised before any planning is considered.

Bats are particularly sensitive to changes in their environment. The introduction of increased artificial lighting, noise, traffic and vibration, together with changes to vegetation, buildings, access

routes and drainage, could alter established feeding, commuting and roosting patterns. Increased lighting in particular has the potential to fragment dark flight routes and make previously suitable areas less attractive or accessible to bats.

My concern is therefore not simply the physical loss of habitat. Changing the character of the site and the conditions within it could alter the ecological functionality of the habitat that currently supports these species. Increased vehicle movements, human activity, lighting and noise could create a substantially different environment from that which exists today.

This is especially important given that the applicant's ecological assessment is itself acknowledged to be incomplete and that protected species surveys remain outstanding. It is difficult to understand how the full impact of the development can be properly assessed, mitigated or avoided until those surveys have been completed.

The potential cumulative effects should also be considered. The combination of construction activity, permanent lighting, increased traffic, noise, vibration and changes to habitat and drainage could have a greater impact than any individual factor considered in isolation.

I therefore ask that no decision should be made until comprehensive protected species surveys, including a full assessment of the bat populations and their use of the site, have been completed. The development should demonstrate that important bat habitats and ecological corridors can be retained and protected, and that any proposed lighting, traffic, construction and drainage arrangements will not cause unacceptable harm to these protected species.

The absence of a Biodiversity Net Gain assessment further adds to these concerns. The ecological value of this site should be properly established before any decision is taken that could result in permanent alteration, loss of habitat and further decline of already endangered and protected species.

Water, Sewage and Drainage Infrastructure

I have significant concerns about whether the existing infrastructure is capable of supporting a development of this scale.

The nearest wastewater treatment works, Bicester WwTW, currently serves a population equivalent of approximately 40,436 and has an upgraded design capacity of around 67,840. However, the applicant's own Utilities and Infrastructure Assessment states that potential capacity requires confirmation, including confirmation of permit compliance. There is currently no on-site wastewater treatment plant, while the proposed foul drainage strategy remains provisional and is dependent on further surveys and stakeholder engagement.

Most significantly, there appears to be no written confirmation from Thames Water that the existing network can accommodate the additional demand generated by this development. This is not a minor technical matter. A development accommodating more than a thousand people would inevitably create substantial additional demand for water supply, foul drainage and wastewater treatment.

The application also leaves the long-term foul and surface water drainage solutions to be resolved after permission is granted. Our village already suffers from low water pressure most evenings.

In my view, the necessary infrastructure should be demonstrated as available, deliverable and adequately funded before planning permission is granted, rather than relying upon future investigations and agreements.

Electricity and Utilities

I have similar concerns about electricity provision.

The applicant's own assessment states that the condition, capacity and configuration of the electrical network are currently unknown, and that the capacity of the primary intake has not been verified. Despite this uncertainty, the proposal anticipates an estimated maximum demand of approximately 2.16 MVA and proposes reliance on temporary and permanent generators rather than a confirmed grid connection.

There is also no proposed gas supply, meaning that heating, hot water and cooking for more than a thousand people would depend upon this already uncertain electricity provision.

The only correspondence with the network operator included in the application is an automated asset-protection response which expressly does not constitute a formal agreement or consent.

I ask that questions about the cost, practicality, reliability and environmental consequences of providing the necessary electricity infrastructure be answered prior to planning being given. If significant new infrastructure, generators, connections or upgrades are required, the full cost, feasibility and responsibility for delivering these works should be clearly established before the development is approved.

Financial and Infrastructure Implications

The infrastructure concerns should not be considered in isolation. A development of this scale requires substantial investment in water, sewage, electricity, drainage, access and other essential services.

At present, key elements of this infrastructure remain uncertain or provisional. The application leaves matters including the long-term power supply and foul and surface water drainage to be resolved following any planning permission.

There should therefore be a clear and transparent assessment of what infrastructure is required, who will provide it, how it will be funded, and whether it can realistically be delivered within the necessary timescale. The cost of providing or upgrading infrastructure should not simply be assumed away because the development is considered nationally important.

I am particularly concerned that approving the development before these matters have been properly established could result in significant additional public expenditure or leave essential infrastructure dependent upon future agreements that are not currently secured.

Flood Risk

Flood risk is another significant concern. The village experiences regular flooding due to its topographical 'run off' effect, the inability of the Piddington Brook to cope with the volume of water during heavy downpours and storms. Certain parts of the village are inaccessible during adverse weather conditions. Roads and lanes leading to, adjacent to or parallel to Site A (Thame Road,

Widnell Lane, [redacted]) become treacherous to drive through, especially at night where there are no pavements and no street lighting. High risk for both driver and pedestrian.

The applicant's own Flood Risk Assessment records that approximately a quarter of the site has a high chance of surface water flooding in any given year, with additional areas identified as being at medium and low risk.

I am concerned because the Environment Agency's standard surface water modelling used in the assessment does not take account of the site's private drainage ditches and pipework. The condition of this existing drainage infrastructure has not been surveyed. At the same time, the drainage strategy required to manage the identified flood risk had not been finalised when the Flood Risk Assessment was submitted.

This creates an obvious concern about whether the existing drainage system can safely accommodate the development and whether construction could increase surface water run-off or transfer flood risk elsewhere.

Given that a substantial proportion of the site is already identified as being at high risk of surface water flooding, I believe the complete drainage strategy, including detailed modelling of existing drainage infrastructure and the impact of the proposed development, should be available and independently scrutinised before any decision is made.

I conclude by stating that these issues demonstrate that the proposal has not yet established a sufficiently robust understanding of the site's environmental constraints or the infrastructure required to support a development of this scale.

In particular: the ecological assessment is expressly incomplete and protected species surveys, especially the presence of bats, remain outstanding; no Biodiversity Net Gain assessment appears to have been provided; wastewater capacity has not been confirmed; the foul drainage strategy remains provisional; there is no evidence of a confirmed Thames Water agreement for the additional demand; the capacity of the electricity supply remains unknown; the proposed electricity demand is substantial and would initially rely upon generators; long-term power and drainage arrangements remain unresolved; the financial responsibility and costs associated with providing the required infrastructure need to be clearly established; and approximately a quarter of the site is identified as having a high chance of surface water flooding, while the existing private drainage infrastructure has not been adequately surveyed.

These are fundamental matters of deliverability, environmental protection and public safety. These are not details that should be left to be resolved after planning permission has been granted. I therefore respectfully request that the application be refused, or at the very least deferred until the outstanding ecological surveys, biodiversity assessment, infrastructure capacity assessments, detailed drainage strategy and associated delivery and funding arrangements have been completed and made available for proper public and planning scrutiny.

Yours faithfully,

[redacted]

51. [redacted]

Address: [redacted], Piddington, [redacted]
Date: Sunday 13th September 2026

[redacted]

[redacted]
Piddington
[redacted]

Sunday 13th September 2026.

Dear Sir/Madam,

Re: Planning Application (PCU/RARE/C3105/3378843)

I am writing to object to the planning application for the proposed development at MOD Bicester Site A.

My principal concern is the ecological impact of the proposal. The more information that has emerged about the site, the clearer it has become that the ecological evidence submitted with the application is not sufficient to allow the full environmental consequences of the development to be properly understood.

Ecology and biodiversity

A recent review of local wildlife records has identified a significant number of protected and threatened species on and around MOD Bicester Site A. These records include:

- 12 protected bat species recorded within 2km of the site;
- an otter recorded close to the MOD boundary;
- breeding great-crested newts, including records very close to the application site;
- badgers recorded approximately 300 metres away;
- nightingale recorded on MOD Bicester land;
- 66 bird species, including 27 species on the UK conservation Red List; and
- 188 records of rare and protected wildflowers.

These records do not, by themselves, prove that every species is currently present within the precise development footprint. However, that is not the point. Wildlife records establish the ecological baseline for an area and can determine whether additional surveys are necessary before a planning decision is made.

I am particularly concerned that the applicant's Preliminary Ecological Appraisal reported “no records” for several of these species’ groups. The Preliminary Ecological Appraisal also states that it is not a comprehensive assessment and that several protected species surveys remain outstanding.

The information also raises questions about the completeness of the background data search. The Preliminary Ecological Appraisal does not identify the Thames Valley Environmental Records Centre, the Local Environmental Records Centre for Oxfordshire, as a source for its background data search.

This is potentially significant. Where a site has records of protected bats, breeding great, crested newts, otters, badgers and large numbers of threatened birds and plants, the absence of those records from the applicant's ecological baseline cannot simply be treated as evidence that those species are absent.

The bat records are particularly concerning. The presence of multiple protected bat species, including the Uk's rarest bat, a barbastelle bat, in the surrounding area means that the potential effects of the development cannot reasonably be considered only in terms of whether a physical bat roost is destroyed. The development could alter habitats and flight routes through new lighting, construction activity, noise, vibration, vehicle movements, vegetation clearance, drainage works and changes to the character of the site.

Artificial lighting has the potential to affect nocturnal wildlife and to alter feeding and commuting behaviour. Where protected bats are already recorded in the surrounding area, the potential cumulative effects of lighting, noise, traffic and habitat alteration need to be properly assessed before development takes place.

The same principle applies to the recorded great-crested newts, otters, badgers and protected and threatened bird species. The presence of these species within or close to the wider MOD land means that the ecological assessment needs to establish how they use the site and surrounding habitats, rather than relying on an incomplete desk-based baseline.

This is especially important given that the application is being dealt with through the Urgent Crown Development process. In my view, urgency cannot justify making a decision on incomplete ecological evidence. The Council should have sufficient information to understand the environmental consequences of the proposal before determining the application.

I therefore ask that the application is not determined until a comprehensive and up-to-date ecological assessment has been completed, including the outstanding protected-species surveys, a full consideration of the wildlife records identified above, appropriate bat surveys and assessment of commuting and foraging habitat, and assessment of the potential impacts of lighting, noise, traffic, vibration, drainage and habitat alteration.

The applicant's current ecological information does not appear to provide that level of certainty. There also appears to be no published Biodiversity Net Gain assessment, while Natural England has been consulted and relevant correspondence has not been fully published.

The wider application

My ecological concerns form part of a wider concern that the application does not yet contain sufficiently complete or consistent information to allow the proposal to be properly assessed.

The application contains several discrepancies and unresolved matters, while important information appears to be deferred until after any permission is granted. For example, the submitted Site Parameters Plan contains no dimensions, heights, access points, parking numbers or key, and there is no detailed site layout, floor plans, elevations, external lighting layout, boundary or security fencing plan, or drainage layout. At least nine matters are identified as being left to be resolved after permission, including lighting, contamination, long-term power and long-term foul and surface-water drainage.

This is particularly concerning in the context of ecology, because lighting and drainage are not minor details. They can have direct consequences for protected species and habitats.

There are also unresolved issues concerning the site's former use as a wartime ordnance depot. The submitted assessments identify a realistic risk of unexploded ordnance and contamination, but the work undertaken appears to be preliminary and desk-based, with no intrusive ground investigation having been completed before the application was submitted. The geo-environmental assessment also identifies areas historically used for handling and storing munitions and flags asbestos-containing material in made ground.

Water, drainage and flooding

There are also substantial uncertainties surrounding water and drainage.

The nearest wastewater treatment works, Bicester WwTW, serves a population equivalent of approximately 40,436 and has a design capacity of around 67,840. The applicant's own utilities assessment states that potential headroom may exist but requires confirmation of capacity and permit compliance. The foul drainage strategy is described as provisional, and there is no evidence

in the application that Thames Water has confirmed in writing that the network can accommodate the proposed additional demand.

The flooding position is also concerning. The applicant's Flood Risk Assessment records that around a quarter of the site has a “high chance” of surface-water flooding in any given year. The assessment relies on Environment Agency modelling that does not take account of the site's private drainage ditches and pipework, whose condition has not been surveyed. The drainage strategy required to address this risk had not been finalised when the Flood Risk Assessment was submitted.

Again, these issues have an ecological dimension. Changes to drainage and surface-water management could affect habitats and species using the site and surrounding land.

Electricity and infrastructure

The proposed electricity supply is also not adequately established. The applicant's assessment states that the condition, capacity and configuration of the electrical network are currently unknown and that the capacity of the primary intake has not been verified. The proposal therefore relies on temporary and permanent generators to meet an estimated maximum demand of around 2.16 MVA rather than a confirmed grid connection.

This raises obvious questions about the practicality and long-term sustainability of the proposal, as well as the noise and environmental consequences associated with generator use.

Highways, traffic and safety

I am also concerned about the effect of the proposal on the surrounding roads and rural communities.

The submitted material records approximately 3,000 vehicles per day in each direction on the approach roads, with 85th percentile speeds of around 53–54 mph. Where footways exist, they are approximately one metre wide, despite the Transport Assessment referring to inclusive design guidance recommending a minimum width of two metres. The assessment also appears to rely in places on baseline traffic and speed data transferred from an unrelated road in Essex rather than entirely site-specific data.

Most concerningly, Windell Lane, which provides the direct route towards Piddington, does not appear to have had a traffic count, collision search or safety assessment within the Transport Assessment.

I use this road every day. There is no pavement, no lighting at night and subject to flooding and large patches of surface water. It has a series of blind bends and a speed limit of 60 MPH. These are matters that need to be properly understood before the scale of the proposed development is accepted.

Overall concerns about the application

Taken together, these issues leave me concerned that the application is being advanced before the evidence necessary to assess its full impact has been completed. The applicant's own ecological assessment is explicitly not comprehensive and acknowledges outstanding protected-species surveys. At the same time, important matters relating to lighting, drainage, power, contamination and other infrastructure appear to remain unresolved, while the application documentation contains inconsistencies and omissions.

This is not simply a question of whether these matters could eventually be dealt with by conditions. Some of the information is fundamental to determining whether the development is suitable in the first place.

I therefore respectfully ask the decision-maker to refuse the application.

I believe the following should be addressed before any decision is made:

1. A comprehensive ecological assessment incorporating the newly identified wildlife records.

2. Completion of all outstanding protected-species surveys, including appropriate bat and great crested newt surveys.

3. A proper assessment of the effects of lighting, noise, vibration, traffic, drainage and habitat alteration on protected species.

4. A clear Biodiversity Net Gain assessment.

5. Confirmation of foul-water and wastewater capacity from Thames Water.

6. A finalised drainage strategy supported by an adequate assessment of surface-water flooding.

7. Confirmation of a reliable long-term electricity supply.

8. Completion of appropriate contamination and unexploded-ordnance investigations.

9. A robust, site-specific assessment of highways, pedestrian safety and traffic impacts, particularly along the route towards Piddington.

10. Publication of the outstanding ecological and other technical evidence needed for residents and the decision-maker to properly scrutinise the proposal.

I believe that a development of this scale should not proceed based on incomplete ecological information, unresolved infrastructure requirements and technical assessments that leave fundamental questions unanswered.

The protected species and habitats around MOD Bicester are part of the local environment and cannot simply be treated as an afterthought. Once habitats are altered or wildlife corridors are disrupted, some impacts may be difficult or impossible to reverse.

For these reasons, I strongly object to the application.

Yours faithfully,

[redacted]

52. [redacted]

Address: Piddington, Oxfordshire (address incomplete in submission)
Date: 12 September 2026

Dear Sirs, I am in writing formally objecting to the proposed use of Site A as an illegal immigration facility adjacent to the village of Piddington, where I am a resident. My objection is not based of the …

… site up is multiples of tens of millions, and will quite literally destroy the lives of the residents of our village, who as stated will become prisoners in the own homes. [redacted]

53. [redacted]

Address: Piddington, Oxfordshire (address not stated in submission)
Date: 13.09.2026

DearSir/Madam,

I am writing to formally object to the proposal to accommodate up to 2,550 asylum seekers in or around Piddington.

I want to make clear that my objection is not directed at people seeking asylum. I recognise that individuals fleeing persecution and conflict need appropriate accommodation and support. My concern is whether Piddington is a suitable location for a development of this unprecedented scale and whether the impact on the existing community has been properly considered.

The scale is completely disproportionate

Piddington is a small rural community. Accommodating up to350 people, of which 46 are children and 133 are women. The proposed 2,250 all male asylum seekers would represent a population many times the size of the village itself. This is not a modest addition to the local population; it would fundamentally alter the character and functioning of the community.

A development of this magnitude should not be imposed on a small village without compelling evidence that the location is suitable and that the necessary infrastructure and services are capable of supporting it.

Pressure on local infrastructure and services

There are serious questions about the capacity of local roads, public transport, healthcare, emergency services, policing and other essential services to cope with such a substantial increase in population.

Before any decision is made, there should be independent and transparent assessments of:

- Local healthcare capacity
- Police and emergency-service provision
- Road and pedestrian safety
- Public transport
- Local amenities and services
- Waste, water and other essential infrastructure
- The financial and practical impact on local authorities

It would be irresponsible to approve such a large development without demonstrating that these issues can be adequately addressed.

Road and pedestrian safety

Piddington is a rural community where roads and pedestrian infrastructure were not designed to accommodate a sudden population increase of this scale.

Particular attention must be given to pedestrian safety, road capacity, public transport and access to neighbouring villages and services. Any proposal should be supported by a comprehensive, independently verified transport and safety assessment.

Impact on the local community

Residents have legitimate concerns about the effect of such a large development on the character, tranquillity and cohesion of the village.

These concerns should not be dismissed or characterised as hostility towards asylum seekers. Local residents have a right to raise questions about a proposal that could fundamentally change their community.

The government has a responsibility both to provide appropriate asylum accommodation and to ensure that the burden of doing so is not disproportionately placed on a small rural community.

Lack of meaningful consultation

Residents should have a genuine opportunity to understand the proposal, examine the evidence and express their views before any decision is taken.

There must be complete transparency regarding the proposed numbers, length of stay, security arrangements, staffing, healthcare provision, transport arrangements and the anticipated impact on local services.

A decision of this scale must not be presented to residents as a fait accompli.

Proper safeguarding and security arrangements are essential

Any accommodation facility of this size requires robust safeguarding and security arrangements. Residents should be provided with clear information about staffing levels, security, policing, emergency procedures and how concerns will be dealt with.

These arrangements should be established and independently assessed before the facility becomes operational.

Conclusion

For the reasons outlined above, I strongly object to the proposed accommodation of up to 2,250 asylum seekers in Piddington.

I respectfully ask that the proposal be reconsidered and that a full, independent assessment of its impact on the local community, infrastructure, transport, healthcare, policing and emergency services be undertaken.

If the government believes that Piddington is genuinely suitable for a development of this scale, it should provide residents with the evidence demonstrating why.

Piddington should not be expected to absorb a population several times the size of its own without proper consultation, adequate infrastructure and convincing evidence that the proposal is safe, sustainable and proportionate.

I therefore ask that my objection be formally recorded and fully considered before any final decision is made.

Yours faithfully,

[redacted]

13.09.2026

54. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: 7 September 2026

Re: Objection to Urgent Crown Development Application MOD Bicester (Site A)

Application reference: PCU/RARE/C3105/3378843

Site: Bicester Garrison, Launton Road, Oxfordshire, [redacted]

Applicant: Home Office

Dear Sir/Madam,

I am writing as a resident of Piddington for 45 years.It is a village directly adjoining the MOD Site A application site, and I want to formally object to the above application for a 10-year temporary change of use of MOD Bicester Site A to provide non-detained asylum accommodation for up to 1,256 immigrants (or 3510 as stated twice in your application document). My objections are based on the applicant's own supporting documents and are set out below ..

A. Power, water and sewage infrastructure does not exist on site, and the applicant's own report says the design is not yet resolved

The Utilities and Infrastructure Assessment ("Operation Nettlefire," ref. ONF-15-RP-CV-100003) confirms: no on-site wastewater treatment works has been identified, and the "foul water strategy at RIBA Stage 2 is constrained by incomplete site information," with "key data gaps" including capacity at the municipal treatment works and the condition of the existing foul network (Section 4.6); the existing electrical infrastructure "cannot be relied upon," so temporary and/or permanent generators are proposed to meet an estimated demand of approximately 2.16 MVA (Section 4.2); and potable water is to be "supplemented via a storage tank system" because the mains supply cannot be assumed adequate (Section 4.1). The report's own summary and conclusion states plainly that the surface water strategy "is based on assumptions due to limited surveys, no stakeholder engagement, and incomplete site information, including the absence of ground investigation, CCTV surveys, and full topographical coverage" (Section 5). This is the Home Office's own assessment that the basic services for over a thousand resident's power, drinking water and sewage disposal remain unresolved and are, by the applicant's own words, guesswork pending further surveys.

B. A decade of diesel generation is proposed, but its air quality impact has not been assessed at all.

The Utilities and Infrastructure Assessment confirms the existing electrical infrastructure "cannot be relied upon" and that temporary and/or permanent generators will be needed to meet an estimated maximum demand of approximately 2.16 MVA (Section 4.2), enough to indicate large-scale, sustained diesel generation is intended to substitute for a mains supply, potentially for the full 10-year life of the permission. Despite this, the Air Quality Screening Technical Note assesses only construction dust and vehicle emissions; it states in terms that vehicle-emission dispersion modelling "is not required" and confirms that "the baseline and operation phase dispersion modelling has not been undertaken." Nowhere in the application is there any assessment of the NOx, particulate or CO2 emissions of the generators themselves, even though these are the proposed source to keep the site running. Furthermore, the Habitats Regulation Assessment/PEA mitigation section describes any on-site fuel as "minimal in volume" a characterisation that is difficult to reconcile with a site drawing 2.16 MVA from generators rather than the grid. The Fire Strategy Report, which would ordinarily be expected to address the storage and handling of bulk fuel for an installation of this kind, does not mention fuel storage at all. The applicant should be required to state the actual generator capacity, fuel storage and consumption figures, and to carry

out a proper air quality assessment of operational-phase generator emissions, before this application can be considered adequately assessed on environmental grounds.Given the current price of oil, has the cost been assessed?

C.The applicant's own drainage report puts the sewage works as close as 45 metres from residential accommodation well inside its own stated safety margin

The Drainage Design Statement (Section 9.6, "Odour and Noise") states in terms that "a standard odour boundary from a WwTW [wastewater treatment works] is ~250m from the source of odour," and recommends odour modelling be carried out at 10m, 25m, 50m, 100m and 250m. The same document then confirms that the current masterplan allows only around 100m separation between residents and the WwTW in Phase 1, and that "the residential and welfare units are intended to be approximately 45m from the WwTW for future phases." also it confirms that Launton FC's Bicester Garrison Sports Ground, used by the local community, sits only around 130m from the intended WwTW location. On the applicant's own figures, the accommodation itself will sit at less than a fifth of the odour buffer distance that the same report says is standard for a facility of this kind, and the neighbouring community sports ground falls well inside it too.

D. The site's own ecology survey admits it is not a comprehensive assessment

The Preliminary Ecological Appraisal states that the site visit was carried out in late March, outside the optimal survey window of April–September, and concludes in its own limitations section: "this report cannot, therefore, be considered a comprehensive assessment of the ecological interest of the site." Targeted surveys are still recommended, not yet completed, for hazel dormouse, Barn Owl, breeding birds, great crested newt, reptiles and terrestrial invertebrates, and pre-construction checks are still outstanding for badger and water vole (Section 5.0, Conclusions). Several trees on site were found to have features suitable for roosting bats. The same section confirms the site lies only 1.8km from Arncott Bridge Meadows SSSI and falls within its impact zone. A decision of this scale should not be made on an ecological baseline the applicant's own ecologists say is incomplete. The Village's ecology observers have always said there are numerous and rare animals living and breeding on the site.

E. Natural England itself flagged potential significant effects on the neighbouring SSSI, and the basis for later reassurance is not yet finalised

The Home Office's own Written Statement on the EIA screening direction records that Natural England advised on 23 July 2026 that "the proposal could have potential significant effects on Arncott Bridge SSSI," and that the hydrological connection between the site and the SSSI "cannot be ruled out." Natural England's later comfort, given on 11 and 13 August 2026, is expressly conditional on water quantity and quality being properly managed through the final drainage design, but the applicant's own documents confirm that the foul water and surface water drainage strategies are still provisional and "have yet to be confirmed." The conclusion that no full Environmental Impact Assessment is required therefore rests on a design that does not yet exist, for a site next to a statutory-designated wildlife site that a government advisor has already flagged as being potentially significantly affected.

F. The Transport Assessment's traffic and access conclusions appear to rely on data for the wrong road

The Transport Assessment repeatedly identifies the site access road as "the B1104" including the 7-day Automatic Traffic Counter results for both the northern and southern site accesses (Sections 3.9.2–3.9.6) and the local amenities description (Section 3.6.1) and Table 5-5 is titled "Traffic Impact B1104." However, the same document elsewhere correctly and repeatedly identifies the actual local road serving the site as the Thame Road (Sections 3.3.4, 3.4.2, 3.8.5), and the Utilities and Infrastructure Assessment likewise confirms a gas main runs "within the Thame Road" at the site boundary. There is no B1104 in this part of Oxfordshire. The B1104 reference appears in the same document that uses RAF Wethersfield in Braintree, Essex a site the applicant's own report calls "very similar in nature and scale" and whose traffic data has been used as "an appropriate

proxy" for Bicester (Section 3.10, Section 5.3.13) raising the concern that traffic or access data intended for a different site has found its way into the assessment on which the access strategy for this site depends. The applicant should be required to confirm which figures in the Transport Assessment actually relate to the Bicester site before any weight is placed on them.

G. Key evidence, including on resident safety, has been withheld from public scrutiny

The Secretary of State has directed that a number of documents submitted in support of this application are "sensitive" under section 293B(11) of the Town and Country Planning Act 1990 and has withheld them from publication. On release, 11 sections of the application were reported to have been redacted, including the mitigating measures proposed for suicide and self-harm prevention, health and safety, and the handling of deaths on site. Residents and the local planning authority are therefore being asked to accept, without being able to see the evidence, assurances about matters that go to the heart of site suitability. A process that determines the future of a rural community for a decade, and that touches on the welfare of the people who would live there, cannot be considered to have had proper public consultation when this much of the underlying justification is not open to inspection.

H. This exact proposal was rejected at the same site in 2003, for reasons that remain unaddressed

In 2003, the then government's own proposal to use this site for asylum accommodation was tested at public inquiry and rejected. The planning inspector's stated reasons were that the site was too isolated, that it posed risks to social cohesion, and that it would strain local services. Nothing in the current application explains what has changed since 2003 to overcome those findings; if anything, the isolation of the surrounding villages is unchanged and the proposed capacity (1,256) is higher than what was previously rejected.

I. Statutory consultation has not been properly carried out

Bicester Town Council wrote to the Home Secretary on 14 July 2026, and again on 27 July 2026, raising concerns about planning and site suitability, infrastructure capacity, access and transport, community safety, environmental impact, and the absence of consultation with neighbouring communities. Both letters requested a substantive response by 1 August 2026. That deadline passed, and as of the date this application was validated (2 September 2026), neither the Home Office nor the Home Secretary had acknowledged or responded to either letter. Piddington and the other villages immediately adjoining the site as distinct from Bicester itself have received no direct consultation at all.

J. The scale and duration are disproportionate to the setting

The application seeks a 10-year "temporary" permission to accommodate up to 1,256 single adult men (or 3510 depending on which paragraph you are reading) on a site adjoining villages that have none of the infrastructure to support a population of that size. Piddington, immediately adjacent to the site, is served by only four failing roads and has no school, shop, pub, or public transport of its own. It's only shared amenities are the village hall and playing field which sits close to the site boundary and stand to become unusable in practice once the site is operating at this scale.

K. The site sits unusually close to a large number of schools

The government's own 2026 policy states that asylum accommodation should not be sited close to schools and nurseries, though it does not set a fixed distance. On official Get Information About Schools data, the nearest school to this site Langford Village Community Primary School is approximately 0.13 miles away in a straight line, with four schools within one mile and sixteen within two miles. A serious sexual assault by an immigrant at one of these schools was covered up by the authories.

L. Pedestrian safety and local service capacity have not been demonstrated

The Transport Assessment itself confirms (Section 3.4.1) that “no footways are provided at the northern site access” and that all local roads are rural with grass verges rather than pavements. The Town Council’s concerns about strain on local health services and policing have not been publicly answered, and no public information has been provided showing that NHS primary care, policing, or the local road network can absorb a resident population and associated staff of this scale for a decade.

Conclusion

For the reasons above, in particular the sewage works sited a fraction of the applicant’s own recommended distance from residential accommodation, the admitted absence of resolved power, water and sewage infrastructure, an ecological baseline the applicant’s own consultants describe as incomplete, a Natural England warning of potential significant effects on a neighbouring SSSI that has not been fully resolved, and apparent errors in the Transport Assessment’s core traffic data, I ask that this application be refused, or at minimum that the representation period be extended, the withheld documents released, and the discrepancies identified above corrected and re-published for proper public consultation, before any decision is made.

Yours faithfully,

Mr [redacted]

[redacted]

Piddington

Bicester [redacted]

55. [redacted]

Address: [redacted], [redacted], Blackthorn, [redacted]
Date: 7 September 2026

To the Crown Casework Unit

Ministry of Housing, Communities and Local Government

To: crowncasework@communities.gov.uk

cc: planning@cherwelldc.gov.uk

cc: calum.miller.mp@parliament.uk

cc: pcclerk@blackthornparishcouncil.org.uk

cc: tim.mcnally@piddingtonpc.org

7 September 2026

Formal Representation: Objection to Application PCU/RARE/C3105/3378843

Dear Sir or Madam,

We have lived in Blackthorn for eight years. We are not protesters. We are not people who write to officials or sign petitions. We work, we pay our taxes, we try to look after our family, and we get on with things.

Eight years ago we chose this village deliberately - so that my mother (Shirley Grant), then living alone in Somerton, could be close to us as she got older. That was a decision made out of concern for her and careful planning. It took decades of work to be in a position to carry it out. This house is not just where we live. It is how we have arranged our family's future. We did not take it lightly, and we did not expect it to be undone by an announcement made without our knowledge or consent.

We would also draw the decision-maker's attention at the outset to a specific inconsistency between what the public has been told and what the application documents say. The Home Office's own public factsheet for this site states that it would be designed to be largely self-sufficient to minimise any impact on the local community. The application documents confirm that the site cannot supply its own electricity, has no confirmed water supply, has no viable sewage treatment solution at full capacity, and has no on-site wastewater treatment plant currently in existence. The public was told one thing. The application says another. We ask that this discrepancy be noted as part of the broader context in which this community has received information about this proposal.

We are not planning professionals. The points we raise below are not technical arguments assembled by consultants. They are the questions the applicant's own documents raise - and which should have been answered before this application was submitted. We ask that each be considered on its merits before any determination is reached.

1. THE URGENT CROWN DEVELOPMENT PROCEDURE IS NOT APPROPRIATE FOR THIS APPLICATION

The Urgent Crown Development procedure is, by the Government's own guidance, intended for development that is both nationally important and genuinely urgent - where a decision needs to be made in a matter of days or weeks. The Housing Minister, Matthew Pennycook, described it in the delegated legislation committee as a route to be used very rarely, only where other planning routes cannot secure a decision quickly enough.

This application does not meet that test. The Ministry of Defence confirmed, in response to a Parliamentary Written Question, that its Head of Establishment at MOD Bicester was engaged on proposals to use the site for asylum accommodation in November 2025. Documents published on 2 September 2026 on the MHCLG site show that an ecological survey was conducted in March

2026. The site had therefore been under active consideration for at least seven months before the public announcement in June 2026.

That timeline cannot be squared with a case built on urgency. The Home Office's own Statement of National Importance describes a minimum operational life of ten years for the site and states that it is intended over time to be expanded as a long-term asylum accommodation solution. Urgent, it is not.

Our MP, Calum Miller, has formally written to the Secretary of State on precisely this point. We support his position entirely.

The application seeks a ten-year temporary permission. No financial bond, restoration guarantee or decommissioning plan appears to have been offered or required to ensure the site is actually restored at the end of that period. This is a standard planning requirement for temporary permissions of significant scale. The comparable scheme proposed at this location in the early 2000s was abandoned as uneconomic after substantial public expenditure, with no restoration guarantee in place. The risk that a ten-year temporary permission becomes a permanent fixture without adequate financial security is a material planning consideration that the application has not addressed.

2. CRITICAL INFRASTRUCTURE HAS NOT BEEN ASSESSED - APPROVAL WOULD BE PREMATURE

The application contains, by its own admission, multiple unresolved questions about the most basic things a development of this kind needs to function. These are not details to be confirmed later. They are the foundations, and they have not been laid.

The applicant's own documents confirm:

– The existing utility capacity is described as still to be determined.

– Thames Water has not been consulted. No borehole investigation has been carried out to confirm water supply capacity.

– Confirmed asbestos-containing material is present on the site. The proposal, as we understand it, is not to remove it but to cordon it off. For a development intending to house over 1,250 people for up to ten years, that is not a solution. It is a deferral, with health and liability consequences that grow with every year the cordoning holds - and every year it does not. We ask that a full, funded asbestos remediation plan be required before any determination is reached.

– Surface water flooding affects a significant portion of the site.

– The exact position of some drainage infrastructure is unknown.

A private developer submitting an application on these terms would not expect it to be considered ready for determination. The public interest is not served by applying a lower standard to the Crown.

3. THE POWER SUPPLY POSITION IS UNACCEPTABLE AND UNASSESSED

The applicant's own Utilities and Infrastructure Assessment states that the existing electricity infrastructure cannot currently be relied upon and that generator provision - temporary or permanent - shall therefore be incorporated. The estimated maximum demand is 2.16 MVA.

The Air Quality Screening Technical Note identifies road traffic as the principal operational emissions source. It does not quantify generator emissions at all.

An independent engineering assessment, based on the application's own figures, estimates potential diesel consumption of approximately 20,000 litres per day - around 7.3 million litres per year - requiring a fuel tanker delivery approximately every two days. At current prices, that is of the order of £8 million per year in fuel alone, before generator hire, maintenance and logistics. The carbon output is estimated at 18,900 tonnes of CO_2e per year, against approximately 3,600 tonnes for equivalent grid electricity. More than five times the carbon impact.

We live in rural Oxfordshire. Large-scale diesel generation around the clock, regular heavy tanker movements on roads that already have no footway or safe crossing, and NOx and particulate

emissions that the application has not modelled - these are material considerations that have been entirely ignored. We ask that a full assessment of generator requirements, fuel logistics, air quality and noise be required before any determination is made.

4. THE DRAINAGE PLAN DOES NOT SCALE, GENERATES UNACCEPTABLE HGV MOVEMENTS AND POSES AN UNASSESSED RISK TO LOCAL WATERCOURSES

The applicant's Drainage Design Statement, at section 9.4, confirms that the initial phase may be served by a cesspool with waste tankered away. Section 9.2 of the same document states plainly that this is not a viable option for the total number of service users ultimately anticipated.

In Phase 1 alone, the applicant's own figures produce approximately 75,320 litres of foul waste per day, requiring roughly six tanker loads of 13,600 litres each - approximately 12 HGV movements per day on roads that the application itself confirms have no footway, no safe crossing and no lighting. Treatment works fees for Phase 1 alone are estimated at approximately £38,500 per month, before haulage, storage and contingency.

The applicant has submitted a drainage strategy that its own engineers have said will not work at the proposed scale. That is not a technical footnote. It is the applicant conceding, in its own documents, that a core element of the proposal has no viable solution.

We would also note that Blackthorn and the surrounding area already experience surface water drainage issues. The application has made no assessment of the impact on local watercourses, drainage channels and low-lying land in the surrounding communities in the event of drainage system failure or overflow at the site. That is not a peripheral concern. For residents who already manage surface water on their land, it is a practical and immediate one.

We would also draw attention to the River Ray. A land quality assessment previously commissioned for this site by the Ministry of Defence itself identified the potential for the River Ray to be affected by direct run-off and discharges from the site. The River Ray is a named local watercourse. This risk does not appear to be assessed anywhere in the current application's drainage or flood risk documentation. On a site with confirmed asbestos-containing material, a documented history of storing poisons, corrosives and flammable materials, a 1970 spillage of 300 gallons of hydrochloric acid whose precise location is recorded as unknown, and a drainage strategy the applicant's own engineers acknowledge is unviable at full capacity, the potential for contaminated discharge to reach a named local watercourse is a material consideration that has been entirely overlooked. We ask that a full assessment of off-site drainage impact - including the effect on local watercourses and surrounding communities in failure scenarios - be required before any determination is reached.

5. MULTIPLE ECOLOGICAL SURVEYS ARE OUTSTANDING

The applicant's ecological assessment states, in its own words, that it cannot be considered comprehensive, and records that surveys for bats, breeding birds, reptiles, dormice and great crested newts remain outstanding. No biodiversity net gain assessment appears to have been produced, despite this being a standard requirement for developments of this kind.

Natural England appears to have been consulted more than once. The correspondence said to have resolved its concerns has not been published.

This is a rural site with significant ecological sensitivity. Granting approval before the ecological picture is complete would be contrary to normal planning practice and to the applicant's own obligations under environmental law.

6. HIGHWAY AND PEDESTRIAN SAFETY HAS NOT BEEN ADEQUATELY ADDRESSED

We drive [redacted] and the surrounding lanes regularly. We know these roads.

The Transport Assessment contains no traffic count, no collision search and no safety assessment for Widnell Lane - the direct road between the site and Piddington. Three recorded collisions near the site access over five years are used to conclude that no further road safety analysis is required. Widnell Lane is not mentioned.

There is a recorded road safety incident on this corridor, near Blackthorn, in April 2024, in which a young child died. It is a matter of public record, reported by the BBC. It does not appear anywhere in the Transport Assessment.

The applicant's own documents confirm there is no pedestrian infrastructure serving the site, and that walking to nearby bus stops would not be possible. The proposed highway works include no new footway, no crossing and no lighting. The stated mitigation for the acknowledged danger of people leaving the site on foot is shuttle buses and high-visibility vests.

Where a footway exists at all on the surrounding roads, it is roughly one metre wide. The Department for Transport's own inclusive design guidance, which the Transport Assessment claims to follow, recommends a minimum of two metres.

Large sections of the baseline traffic and speed data are attributed to a road in Essex, transferred from a comparable scheme with different recorded staff shift times, rather than derived from a site-specific survey of these roads. Junction capacity modelling that concludes there is spare capacity carries the software's own warnings that results should be treated with caution, and sets heavy vehicle traffic to zero in three of the four modelled scenarios - on a site expected to generate daily coach, minibus, fuel tanker, waste tanker and delivery movements.

The application also makes no assessment of the impact on existing rural bus services if service users independently access them. Rural routes in this area already operate under significant pressure.

7. THE SCALE IS ENTIRELY DISPROPORTIONATE TO THE LOCATION

Piddington has a population of approximately 350 people, including 46 children. Blackthorn, where we live, has approximately 317 residents of all ages - men, women and children. Between both communities, we number around 667 people in total. The proposed centre would place 1,256 single adult men - confirmed by the Home Office to be aged between 18 and 65 - on our shared doorstep. That is nearly twice our combined population. It is worth being precise about what that comparison actually means: set against 1,256 men, our communities comprise roughly 300 women, elderly residents, children, and the men who live alongside them. It is not 667 adults against 1,256 adults. It is a whole community - in all its mix of ages and vulnerabilities - against a facility housing only single men. That context has not been addressed anywhere in the application.

The Prime Minister has stated publicly that wealthier areas should play a greater role in accommodating asylum seekers - a principle of proportionality that we do not dispute in principle. But proportionality, to be meaningful, must be applied consistently. Piddington's population is approximately 350. The proposed centre would house 1,256 people - nearly four times that population. By the Prime Minister's own proportional logic, the equivalent burden placed on the City of Manchester - population approximately 553,000 - would be to accommodate approximately 2.2 million single adult men in a single facility. The principle of proportionality, invoked by the Prime Minister himself, has not been applied to the relationship between this development and this specific community.

We also note that the applicant's own Unexploded Ordnance Risk Assessment scopes its work around accommodation for 3,510 service users - nearly three times the capacity stated elsewhere in the application. That discrepancy has not been explained. We ask that it be formally clarified before any determination is reached.

The application classifies the proposed use as C2A - Secure Residential Institutions. That is the same planning use class as prisons and detention centres. The Home Office has publicly described the facility as open and non-detained, with residents free to come and go. Both positions cannot be right. We ask the decision-maker to clarify which one it is actually determining.

8. THE COMMUNITY IMPACT HAS NOT BEEN ADEQUATELY ADDRESSED

The Home Office's own Environmental Screening Assessment acknowledges that the development may give rise to anxiety amongst local residents such as through fear of crime, and that service users can, albeit with difficulty, access local populated areas. It acknowledges that the ward area is more deprived than 71% of neighbourhoods in England. It identifies potential health effects on the elderly, the young, those with certain disabilities, and those in pregnancy and maternity.

It then dismisses those effects on the grounds of the site's relative remoteness. The same remoteness used to minimise community impact is the reason the site has no infrastructure, no transport and no services. Those two positions cannot be held simultaneously.

My mother is elderly and lives with us in Blackthorn. We moved to this area partly so that she would not be alone as she aged. She is precisely the kind of person the Home Office's own screening identifies as potentially affected by this development. The application acknowledges that impact and does not address it.

We are also grandparents. Our grandchildren visit us here. They have always been able to play freely in this quiet rural village, around our garden and wooded area - we take them to the local parks - the kind of place that is rarer by the year, and the reason many people choose to live here. That is already changing. And it is changing at the precise moment when the Government's own research and its own financial commitments confirm that free outdoor play in safe rural settings is not a luxury - it is a measurable contributor to children's long-term mental health. Parents in both villages have told us directly that they will not feel able to let their children use local play areas freely if this development proceeds. The application does not assess that impact on community amenity at all.

We have heard from other residents of a property sale in this area that has already fallen through because of this proposal, and of someone who has been unable to obtain a mortgage on a local property because of the anticipated fall in values. These are not predictions of what might happen. In this community, they are already happening.

The financial impact is not abstract, and it reaches far beyond our own situation. We have spoken recently with a neighbour whose elderly parents have genuine health needs and can no longer drive. They had planned to sell their home here and move somewhere more suitable - closer to facilities, closer to the care they need. They cannot now. The fall in property values means that plan is no longer financially possible. They are not trapped by their age or their health. They are trapped by this announcement. That is a specific, human consequence of a planning decision, and it is already happening before a single person has arrived at the site.

For us, the position is similar. We moved here eight years ago. If we were to sell now - at the values already being seen in this area - we could not afford to return to where we were. We could not buy two properties, one for us and one for my mother, or one large enough to share as we do now. Eight years of careful decision-making, of working and saving and planning for our family's future, have been eroded - not by anything we did, but by an announcement made without our knowledge or consent. We will have less to live on and less for our children to inherit. We are not wealthy people who can absorb this. We are people who planned carefully so that we would not have to.

This area risks becoming a community of people who are stuck. People who cannot sell because values have dropped, who cannot afford to move closer to the facilities or care they need, who cannot make the decisions that their own circumstances require. They cannot afford to stay. They cannot afford to go. That is the human cost of this application, and it does not appear anywhere in the applicant's documents.

We would also draw the decision-maker's attention to an equality omission in the application. An existing Traveller site sits approximately 150 metres from the site boundary. Travellers are a protected characteristic under the Equality Act 2010. The applicant's own Equality Impact Assessment does not mention this community or assess the impact of this development on them. The nearest settled community to the proposed development appears to have been entirely overlooked in the equality assessment.

9. THE IMPACT ON COMMUNITY RECREATIONAL FACILITIES HAS NOT BEEN ASSESSED

Play areas and recreational facilities used by local families are in the proximity of this site. The application does not assess the impact on their usability for the existing community.

The Government has recently committed £18 million to the refurbishment and improvement of children's play areas across the country, citing the importance of outdoor play to children's health and mental wellbeing. Research from the University of Exeter's Outdoor Play Research Centre,

published in the Journal of Child Psychology and Psychiatry in June 2026, found that each additional day of outdoor play in the preschool years increases the likelihood of good mental health outcomes by up to 14 per cent.

The same Government is simultaneously proposing to place 1,256 people on the doorstep of communities where children currently enjoy exactly that kind of free, safe, rural play - the very conditions its own evidence says matter most. The impact on recreational amenity for existing residents - including children - is a material consideration. It has not been assessed.

10. HEALTHCARE, MEDICAL PROVISION AND WELFARE HAVE NOT BEEN ADEQUATELY ASSESSED

We have heard that on-site GP and dental provision may be planned for the facility. If so, that commitment does not appear transparently in the application documents, and we ask that it be set out clearly - including how it will be staffed, resourced and sustained over the proposed ten-year operational period.

However, on-site provision does not resolve the wider question of secondary and specialist healthcare. The application does not address how 1,256 people will access hospital care, emergency treatment, or the range of specialist and community health services - physiotherapy, chiropody, mental health referrals, and others - that a population of this size will inevitably require. These are not minor considerations. They represent real and additional demand on services that local residents in the Bicester area already find stretched. No assessment of the cumulative impact on NHS and community health capacity in this area appears to have been undertaken. We ask that one be required before any determination is reached.

We would also note the practical question of how people reach those services from a site with no public transport and no pedestrian route to the nearest bus stop - a question the application has not answered for routine journeys, let alone urgent or emergency ones.

The application documents contain sections on Suicide and Self-Harm Prevention, Health and Safety, and Handling a Death at the Site. All are substantially or entirely redacted. The public - and, we would argue, the decision-maker - cannot properly assess the adequacy of welfare provision because the relevant parts of the application are concealed.

The Home Office's factsheet states that service users arrive following initial screening checks against policing and immigration databases. We note that these checks are, by their nature, limited to databases held in the UK and by UK immigration authorities. They do not include criminal records from countries of origin where such records may not be accessible or shared. The Government's own published data confirms that a significant proportion of those who go through equivalent initial screening processes at comparable facilities are subsequently found not to qualify for asylum for various reasons. The application does not address the known limitations of the screening methodology, what proportion of those screened in this way may subsequently be found to present a risk, or what operational protocols exist for managing such situations once people have already arrived at the site. The adequacy of the risk assessment built on this screening process has not been demonstrated. We ask that it be required before any determination is reached.

Independent evidence, including High Court findings concerning a comparable site, has established that large-scale isolated institutional accommodation of this kind carries a foreseeable risk of mental health deterioration amongst occupants, and described the Home Office's failure to assess the equalities impact of its own allocation policy as a most serious and inexplicable omission. A separate High Court judgment in 2026 found against the Home Office on every ground argued, in a case concerning the very allocation policy that would govern how people are sent to sites such as this one.

We ask that the Secretary of State require disclosure of the redacted welfare sections, or that independent assessment of their adequacy be made a condition of any determination.

11. EMERGENCY SERVICES RESPONSE, ACCESS AND THE PROXIMITY OF HMP BULLINGDON HAVE NOT BEEN ADEQUATELY ADDRESSED

No site-specific capacity assessments appear to have been agreed with Thames Valley Police, Oxfordshire Fire and Rescue Service, South Central Ambulance Service, or the county council as highway and flood authority. None of these bodies is a mandatory statutory consultee under the fast-track procedure being used. Under normal planning procedure, they would be.

The roads around this site are narrow rural roads with no footway. The application acknowledges that service users leaving the site on foot presents a danger. If they are walking along roads with no safe space, they create a direct hazard to emergency vehicle access and response times. An ambulance or fire engine responding to an incident on these roads - where pedestrians have nowhere to stand clear - is a foreseeable risk that the application has not addressed.

We also note that HMP Bullingdon - a Category B prison that the applicant's own Statement of National Importance records as directly opposite the site - is currently being expanded. Construction to add approximately 247 places and increase total capacity to over 1,300 prisoners was due to complete in August 2026. The application assessed the proximity of the existing prison. The impact of the expanded prison - on emergency services capacity, on road access, and on the cumulative effect of both major developments in the same rural area - has not been assessed.

We would also draw the decision-maker's attention to a welfare consideration that is the inverse of the usual community concern. Isolated, economically deprived individuals with minimal income, no ability to work, and no established support network are recognised as vulnerable to exploitation by criminal networks. The proximity of an expanding Category B prison to a population of 1,256 people meeting precisely that description, in a remote location, has not been assessed as a safeguarding risk anywhere in the application. We raise this not as an assumption about the character of future occupants, but as a foreseeable risk to their own welfare that the application has not addressed.

12. THE APPLICATION IS MATERIALLY INCOMPLETE

The Site Parameters Plan - one of only three drawings submitted for approval - contains no dimensions, no heights, no access points, no parking numbers and no key.

No site layout, no floor plans, no elevations, no external lighting layout, no boundary or fencing plan and no drainage layout has been provided.

At least nine matters are deferred for resolution after any permission is granted, including the lighting scheme, the contamination investigation, the long-term power supply and the long-term drainage solution.

The Application Form's tables for materials, parking numbers and staffing levels appear to have been left blank, despite figures for these matters appearing elsewhere in the submitted documents.

The Air Quality Screening Technical Note states in its summary that it involved identifying sensitive receptors. A later section of the same document states plainly that no sensitive receptors were selected. The document contradicts itself.

The applicant's own documents are internally inconsistent on the number of Nissen huts to be demolished, the site's level above ordnance datum, the deprivation ranking of the local area, the intended length of stay for occupants, and whether the site is vacant or in active operational use.

These are not typographical errors. They are signs of an application assembled under pressure, without the time or evidence base to make it coherent. If a private developer submitted an application in this condition, it would be returned. We ask that the same standards apply here.

13. NO COMMUNITY LIAISON OR PREPAREDNESS PLAN HAS BEEN PROVIDED

The application makes no provision for community education, liaison or preparedness beyond the site boundary. Local residents have no guidance on how to respond if they encounter a service user in distress in the surrounding area - how to help, what agencies to contact, what cultural or communication considerations apply, or what protocols exist.

That is not hostility. It is the most basic practical gap in a proposal of this kind. We would want to help if we encountered someone in difficulty. We do not know how. The application does not say.

We would also note that some residents of isolated rural properties, including ourselves, in the vicinity of this site have begun conducting their own security assessments as a result of this proposal. That is not hysteria. It is a reasonable response to a situation in which the applicant has provided no guidance, no individual risk assessment and no support whatsoever to the residential communities closest to the site. The application has created a level of personal anxiety and personal cost - in time, in worry, in freedom - that it has neither acknowledged nor addressed.

The cost and resource implications of delivering meaningful community liaison and cultural awareness support across the affected communities have not been identified, budgeted for or addressed anywhere in the documents. We ask that a fully costed community liaison plan be required as a condition of any determination.

14. THE DEMOGRAPHIC STRUCTURE OF THE PROPOSED POPULATION AND ITS IMPACT ON COMMUNITY COHESION HAS NOT BEEN ASSESSED

The application has not assessed the social cohesion implications of the demographic profile it proposes to introduce into this area. Normal, functioning communities comprise a mix of ages, sexes and family structures. The proposed development would create, within an area currently home to approximately 667 residents of all ages and backgrounds, an additional population of 1,256 single adult men with no family connections, no established community ties, no employment and no social anchors in the area.

Published research by the European Spatial Planning Observation Network, a body whose work directly informs planning policy across Europe, confirms that significant gender imbalances in a local population are both a territorial development concern and a condition that has measurable impacts on social and territorial cohesion. That research applies in planning contexts precisely because demographic structure is a legitimate material consideration, not merely a political one.

No assessment of the social cohesion impact of introducing this specific demographic profile into these specific communities has been provided. We ask that one be required before any determination is reached.

15. THE CUMULATIVE IMPACT OF MULTIPLE MAJOR DEVELOPMENTS IN THIS AREA HAS NOT BEEN ASSESSED

Sites D and E of MOD Bicester already have planning permission for a development of approximately 1,900 new homes, a primary school, shops and community facilities - the Graven Hill development, currently under construction. HMP Bullingdon is simultaneously being expanded to add approximately 247 prison places, bringing its total capacity to over 1,300. Site A now proposes to add 1,256 people to the same rural area.

Three major developments are being delivered simultaneously in this rural area, with no cumulative assessment of their combined impact on local road capacity, water supply, sewage infrastructure, emergency services capacity, community facilities, or the character and cohesion of the surrounding settlements.

Cumulative impact assessment is a standard planning requirement. The interaction between these three developments - in terms of construction traffic, utility demand, infrastructure pressure and community change - has not been assessed at all. We ask that a cumulative impact assessment covering all three developments be required before any determination is reached on this application.

CONCLUSION

We have written to the Home Secretary. We have attended the meetings. Anything that has been released, we have tried to read with an open mind and understand. We have engaged with every proper channel available to us, because we believe that is what citizens in a democracy are supposed to do. We are not people who march or join public demonstrations - that is not how we have ever chosen to make our voices heard. But we are aware that many of our neighbours feel so strongly about this proposal that they are prepared to do exactly that. That is their democratic right, and we understand why they feel it. What it tells us - and what we ask the decision-maker to note - is the depth and breadth of feeling in these communities. When ordinary, law-abiding people who

have never protested in their lives find themselves considering it, something has gone seriously wrong with the way a decision has been handled.

Whatever views one holds on asylum policy more broadly, our objection to this specific application is based entirely on the material planning considerations set out above. We ask that it be assessed on that basis.

If a private developer submitted this application, it would not be considered ready to determine. The Crown should be held to the same standard.

We ask that the application be refused, or that a substantially extended representation period and further information requirements be imposed before any determination is reached.

Yours faithfully,

[redacted]

[redacted], [redacted], Blackthorn, [redacted]

[redacted]

[redacted]

Della: [redacted]

Michael: [redacted]

07 September 2026

56. [redacted]

Address: [redacted], [redacted], Piddington, [redacted]
Date: 14 September 2026

Date: 14 September 2026

To: Planning Inspectorate: Crown Development Casework Unit
(crowncasework@communities.gov.uk)

Dear Sir, Madam

I am writing to formally OBJECT in the strongest possible terms to the urgent Crown development application for the change of use and development of Site A, MOD Bicester, to accommodate up to 1,250 single adult men.

As a local resident living in the immediate vicinity, I know this landscape and its local infrastructure intimately. The proposed development is entirely unsuitable in scale, location, and infrastructure capacity, and the application relies on an incomplete, inconsistent, and flawed submission pack.

My specific planning-based objections are detailed below:

1. Inappropriate Scale and Premature Use of "Urgent" Crown Procedure

Disproportionate Impact: A population of 1,256 people is more than four times the entire recorded population of Piddington (304 residents). Dumping a population of this scale into a rural area without local services fundamentally undermines the community balance. Furthermore, the preliminary Unexploded Ordnance (UXO) Risk Assessment references scoping for "3,510 service users," suggesting the actual eventual scale may be vastly larger than stated.

Misuse of the Section 293B-293C Process: This fast-track procedure is intended for genuine national emergencies. Yet, the Home Office's own factsheet cites an operational life of at least ten years, and its Statement of National Importance notes the site is intended as a long-term solution. A long-term operational facility cannot lawfully bypass standard planning procedures under the guise of temporary, emergency urgency.

Contradictory Classification: The application form categorises the site as Use Class C2A (Secure Residential Institutions, used for prisons), despite public assertions that this is an open, "non-detained" facility where residents are free to come and go.

2. Severe Highways, Access, and Pedestrian Safety Risks

Dangerous Walking Conditions: Roads surrounding the site (such as the Thame Road) carry traffic averaging 3,000 vehicles daily per direction at around 50mph. The existing footways are barely one metre wide where they exist at all—failing the Department for Transport's 2-metre inclusive design standard cited in the applicant's own Transport Assessment.

Omission of Local Routes: Widnell Lane—the direct route into Piddington—has been completely omitted from traffic counts, collision searches, and safety assessments. As someone who regularly travels along these roads, I know how narrow, unlit, and hazardous they are for pedestrians and vehicles alike.

3. Unconfirmed Utilities, Drainage, and Environmental Risks

Lack of Confirmed Capacity: The applicant's own Utilities Assessment confirms that the electrical network capacity is "currently unknown" and the primary intake capacity "has not been verified". Reliance on temporary and permanent diesel generators to supply power for heating, hot water, and cooking for over 1,000 people will cause unacceptable noise, vibration, and air pollution.

Water and Sewage Shortfalls: There is no on-site wastewater treatment plant, and zero written confirmation from Thames Water that the foul drainage network can handle this massive load. We already experience water pressure fluctuations, and adding a town-sized demand without pre-assessed capacity is unsustainable.

Flood and Contamination Risks: Roughly 25% of the site has a high annual risk of surface water flooding, yet the drainage strategy remains unfinalised. Moreover, despite a history of handling munitions and potential asbestos risks in the ground, only a desk-based preliminary survey was conducted without essential intrusive ground investigations.

4. Unassessed Service Pressure, Safeguarding, and Policy Conflicts

Missing Statutory Assessments: No site-specific capacity assessments have been agreed with local healthcare, Thames Valley Police, or emergency services.

Lack of Environmental & Heritage Compliance: Key ecological surveys remain outstanding, no Biodiversity Net Gain assessment has been provided, and heritage impact mitigation for potential Roman/medieval remains has not been secured.

Conflict with Local Plan: The scheme directly conflicts with Cherwell Local Plan 2011–2031 policies, including Policy PSD1 (Presumption in Favour of Sustainable Development), Policy SLE4 (Safe and Suitable Access), and Policy INF1 (Infrastructure). A near-identical 2003 proposal nearby was turned down by a Planning Inspector precisely due to its unsustainable, isolated location and pedestrian safety risks.

Conclusion & Formal Request

This application attempts to push through a massive, permanent, and highly impactful institutional development via a rushed Crown process without basic details, accurate site data, or secured infrastructure.

I request that the decision-maker refuse permission for Application PCU/RARE/C3105/3378843. At the very least, no decision should be made until full, non-provisional assessments for water, foul drainage, electrical grid connections, highways safety, and ground contamination are submitted for proper public review.

Please acknowledge receipt of this representation and keep me informed of all future decision steps and outcomes regarding this case.

Yours Sincerely,

[redacted]

[redacted], [redacted], [redacted], PIDDINGTON

57. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]

Date: 8 September 2026

FORMAL OBJECTION – MOD BICESTER SITE A

Application reference: PCU/RARE/C3105/3378843

Name: [redacted]

Address: [redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

Date: 8 September 2026

Dear Crown Development Casework Unit,

I am writing as a resident of Piddington to formally object to the proposed development at MOD Bicester Site A.

I want to make clear from the outset that my objection is to this site, the scale of the proposed development and whether its suitability has actually been demonstrated. It is not an objection to people seeking asylum.

Having lived beside these roads and this site and having now spent time reading through the application documents, I am left with some fairly fundamental questions that I don't think have been

answered.

1. Accessibility and road safety

This is probably my biggest concern as I use these roads daily and know what they are actually like.

The roads surrounding the site are rural, fast and largely unlit, with long stretches where there is no proper pavement or safe pedestrian route. I would not personally consider walking along parts of these roads safe, particularly after dark.

The applicant's own Transport Assessment acknowledges that the location is “not ideal” for accessibility by sustainable travel. It also confirms that there are no existing footpaths through or accessible from the site and refers to an “absence of any pedestrian infrastructure serving the site.”

The proposed solution appears to be for people accommodated at the site to use Home Office minibuses.

It also says that, apart from the MOD sports pitches, there are no other facilities within a 2km walking distance of the site. I find it difficult to understand how those facts support the conclusion that this is an appropriate location for accommodation for up to 1,256 people. Making the site self-contained and providing minibuses doesn't change the accessibility of the location. To me, that feels like managing around the problem rather than solving it.

My particular concern is the Thame Road. I drive this road regularly. It is a fast rural road and there are
stretches without a proper pavement or street lighting. This isn't an abstract concern to me; I know what it is like to use this road, particularly in poor weather and darkness, and I would not feel safe walking along it myself. The proposed minibus service doesn't remove the need to properly assess pedestrian safety. A transport strategy cannot guarantee that every journey from a residential development will be made by minibus.

I would therefore like the decision-maker to be satisfied that the [redacted] and the other routes immediately surrounding the site have been properly assessed for pedestrian safety, including what
happens when journeys are made on foot, rather than relying principally on proposed operational transport arrangements.

There is something else in the Transport Assessment that concerns me.

It says that because of the fast-track nature of this application, no pre-application scoping discussions were held with the local planning and highway authorities before the Transport Assessment was prepared. For a development of this scale in a rural location, that seems extraordinary to me. The same assessment refers to national policy requiring safe and suitable access for all users and says transport considerations should form part of early engagement.

I don't understand how that requirement can have been properly satisfied when the local highway authority wasn't involved in scoping the Transport Assessment in the first place.

2. Arncott Bridge Meadows SSSI

I am also very concerned about what I have read in Natural England's correspondence concerning Arncott Bridge Meadows SSSI.

On the information provided to it, Natural England said that the proposal could have potential significant effects on the SSSI and requested further information about hydrological pathways between the development and the protected site. It specifically asked to be re-consulted once that information had been obtained. Further correspondence then states that a hydrological connection between Site A and the SSSI “cannot be ruled out”.

But the part I find particularly difficult to understand is this:

Natural England also states that it “has not had sight of the drainage details themselves” and that its
advice at that stage was instead based on an email dated 16 July. Natural England again asked to be
re-consulted once the information had been obtained.

This leaves me with a very simple question:

Has Natural England now seen the completed drainage information it requested, and has it confirmed that the potential impact on Arncott Bridge Meadows SSSI has been satisfactorily addressed?

The Government's application page currently has a section for statutory consultee responses, but I cannot see a published response there resolving this point. If that assessment has taken place, I

believe residents and the decision-maker should be able to see it. If it has not, I do not understand how the potential impact on a nationally protected SSSI can yet be regarded as resolved.

3. How much was actually known when this process began?

I appreciate that the Government considers the development urgent. However, urgency shouldn't mean that the suitability of the site is established afterwards.

On 14 July 2026, the Home Office was asked in Parliament what assessment it had made of the adequacy of utilities and infrastructure at Site A.

The answer was:

“Suitability assessments are ongoing”

The answer specifically said those assessments would consider utilities, infrastructure, safety, security, operational deliverability, planning requirements and impacts on local services and communities. On the same day, the Home Office was asked what transport arrangements would allow people accommodated at Site A to access healthcare, legal appointments and other essential
services.

Again, it said suitability assessments were ongoing and that transport arrangements would be considered as part of operational planning if the site was taken forward. And on 15 July the Government said the site remained subject to ongoing “feasibility, planning, design, assurance and governance processes.” That concerns me because these are not minor details.

They go directly to whether this particular site can safely and practically accommodate the proposed development. The Parish Council's guidance identifies a number of matters within the submitted documents that still appear provisional or unresolved, including utilities, drainage, ecology and ground conditions.

I therefore think the decision-maker should establish exactly which suitability and feasibility assessments were still outstanding when the urgent process was pursued, when they were completed, and whether their findings are now available as part of this application.

4. Calling the development “temporary”

There is another contradiction in the Transport Assessment which I don't understand.

The Government describes this application as the “10-year temporary use” of Site A.

The Transport Assessment repeatedly relies on that temporary nature when discussing the shortcomings of the location. In fact, immediately after acknowledging that the location is “not ideal” for sustainable accessibility, it cites the temporary nature of the proposed use as part of its justification. However, elsewhere the exact same document says: “initially for a period of ten years” and says the facilities are being designed to operate for longer in case use beyond ten years is required. Those two things don't sit comfortably together for me.

If the site's poor accessibility is considered acceptable partly because the development is temporary, I think the decision-maker needs to consider how much weight can properly be placed on that argument when the infrastructure is deliberately being designed so that its use can extend beyond ten years.

Ten years is also a substantial period in its own right. For residents of Piddington, this isn't a short-term construction project. It is potentially a decade or more of a fundamentally different use of the land immediately beside our community.

5. Reliance on things being dealt with later

Probably the thing that concerns me most after reading all of this is how often the answer appears to be that something will happen later.

Transport arrangements were to be considered as part of operational planning. The Transport Assessment says the specialist accommodation provider who will actually operate the site was “yet to be appointed.” Natural England asked to be re-consulted when further information became available. And in July, the Government itself said suitability, feasibility, design, assurance and governance work was still ongoing.

I appreciate that every planning application will contain matters that are dealt with by condition or at a later stage. But there must surely be a distinction between details that can reasonably follow planning permission and the fundamental evidence required to establish that this particular site is suitable in the first place.

That is ultimately the basis of my objection.

Conclusion

I understand the national pressure on asylum accommodation and the Government's desire to reduce the use of hotels. But a national need for accommodation does not automatically make every available piece of Crown land a suitable location for it.

The Home Office is asking for full planning permission for accommodation for up to 1,256 people. Its own Transport Assessment accepts that this rural location is not ideal for sustainable accessibility and has no pedestrian infrastructure serving it. Natural England has said that a hydrological connection with a protected SSSI cannot be ruled out. And only weeks before this application was validated, the Government was publicly saying that fundamental suitability work was still ongoing.

These aren't political objections. They are questions about this site. I therefore respectfully ask the Secretary of State not to grant planning permission unless and until the suitability of Site A has been fully demonstrated, the outstanding environmental and infrastructure questions have been satisfactorily resolved, and the necessary evidence has been made available for proper consideration.

I would be grateful if this representation could be placed on the official case file and taken into account when the application is determined.

Yours faithfully,

[redacted]

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

58. [redacted]

Address: [redacted], [redacted], Piddington, Bicester, Oxon, [redacted]
Date: 12th September 2026

Application Reference: PCU/RARE/C3105/3378843

I am writing to record my objection to this planning application.

My reason for objecting is the location of the Site A in that it is unsafe for asylum seekers leaving and entering on foot.

I am fully aware that the plan is to discourage this:

“To enter or exit the site on foot would require considerable care and SUs will be strongly encouraged to only do so using the shuttle bus provision on safety grounds. To further emphasise the potential danger, high visibility vests will be provided to those leaving on foot and further discourage this mode.”

Asylum seekers would therefore be discouraged from leaving on foot but would not be prohibited from leaving on foot.

Asylum seekers who leave the site on a shuttle bus to travel to a local town would also presumably be discouraged from returning on foot but would not be prohibited.

I have lived in the village of Piddington for nearly 50 years. I have travelled regularly from Piddington to Bicester, my place of work, along the Thame Road. This is a busy road with vehicles travelling at high speeds. Traffic has grown consistently over the years. The most notable feature has been the growing number of large lorries that use this route. Most cars and lorries travel at or in excess of the maximum speed limit.

If I travel to or from Bicester along the Thame Road at close to the speed limit I will be holding up a queue of vehicles desperate to overtake. There are hardly any straight sections where overtaking is possible safely and none where it can be done safely when travelling in excess of the speed limit.

Anyone living locally would consider attempting to walk along this road as completely reckless.

Over the years I have witnessed a few people attempting this. There is no pavement. They walk along the side of the road. Sometimes facing oncoming traffic, sometimes not. If they hear or see vehicles travelling towards them, they will try to step up to the grass verge to avoid the approaching vehicles. They can not walk along the verges. They are deeply rutted. To trip would probably mean falling into the road.

The planning application’s Transport Assessment makes no reference to Sundays. Sundays have a little less traffic on the Thame Road. They are at times, however, considerably noisier! A little less traffic and not working at the weekend means that Sundays are Biker Days!

The 11-mile stretch between Long Crendon and the junction with the A41 is the particular favourite amongst motorcycling enthusiasts with bikers travelling in groups from great distances to test their skills. Online reviews show that travelling north provides the biggest challenge, especially the section known as “Piddington Pitches”.

Bikers can lean into a sharp left-hand bend at the first Piddington junction. Accelerate hard out of this bend, down the hill and experience the series of hidden dips before leaning into hard right-hand bend before accelerating again past the prison and the entrance to MOD Site A.

Two reviews on “BestBikingRoads” by bikers such as SpeedMonster and Scootercrusher:

“I rode it in both directions and it's a cracker. One bit of it's like a roller coaster. Only done it in the winter though, will go back in the summer. On weekdays it carries a lot of heavy lorries, and there’s a huge army and RAF base at Bicester so no shortage of traffic.”

“I agree it's best Thame to Bicester. No cameras but as said before there have been a few deaths and the police do sometimes use unmarked cars on this section (but not often). One bend in particular tightens up not too hard but it can catch you out so first time beware. Also, nasty off

camber on one bend in particular. Stick to the 30 through Oakley as this is where you will get screwed big time."

Bikers often park up at the junction with the A41 to compare their experiences and the speed of their runs. Before returning to complete the run again.

Those not of a nervous disposition might search "motorcycle ride Thame Road" where you will find videos of bikers on this route. The speedometers on their bikes have been obscured before the videos have been posted.

Sundays could provide exhilarating entertainment, speed and noise for young male asylum seeker spectators lining the verges outside of MOD Site A.

Sadly, the same online search will produce some very different results:

Sunday 14th April 2024. A five-year-old boy has been killed in a car crash involving a motorcyclist at a junction on a main road near Bicester.

The crash involved a white and orange KTM motorcycle and a black Ford Focus on the Thame Road at the junction of [redacted] in Blackthorn.

The rider of the motorbike, a man aged in his 40s, was taken to the John Radcliffe Hospital in Oxford with serious injuries.

While the driver of the Ford Focus, a woman in her 30s and a nine-year-old child were also treated in hospital for less serious injuries.

The boy was travelling as a rear-seat passenger in the Ford Focus.

The crash took place yesterday (Sunday, April 14) at around 2pm.

No arrests have been made as Thames Valley Police launch an appeal for witnesses.

Lead investigator Phil Hanham of the Serious Collision Investigation Unit, based in Bicester, said: "Very sadly, as a result of this collision, a child has died of his injuries.

"His family are being supported by specially trained family liaison officers and the thoughts of all of us at Thames Valley Police are with them at this extremely upsetting time.

"I would like to appeal to anybody who witnessed this collision to please get in touch with Thames Valley Police.

"I am particularly looking to hear from anyone who may have been driving in the area and who has dash-cam which has captured the collision, or the moments leading up to it, to please contact us.

"You can do so by making a report online or by calling 101, quoting the reference 43240170525.

Sunday 9th November 2025. A biker in his fifties has been seriously injured after a crash involving a Blue Toyota Hilux and a Yellow Honda CBR900 Motorcycle in Bucks.

The crash, on the [redacted] in Brill, took place at around 9.30am on Sunday, November 9th 2025.

The rider of the motorcycle, a man in his fifties, sustained serious injuries, requiring hospital treatment.

He has since been discharged. A police probe is underway. Investigating officer PC Dean O'Dell said: "I am appealing to anyone who witnessed this collision to please come forward.

"I am also appealing to anyone who was driving in the area on the day who may have captured the collision, or the moments leading up to it, on their dash cam, to please get in contact.

"Anyone with information can call 101 or make an online report, via our website, quoting crime reference number 43250572350.

This road is dangerous at the best of times. To travel in a 1-ton car or a 20-ton dump truck will provide the driver with some protection. A pedestrian, day or night, with or without a high visibility vest has no protection.

Having read through this letter a final time before sending it I have had one additional thought: Suicide.

I am sure there are firm plans to do everything possible to prevent asylum seekers from committing suicide. Research published by medical charities show that asylum seekers, especially those held in large sites, are much more likely to have thoughts of suicide and to make attempts to end their own lives.

There is no description in the application of measures that will be taken to try to prevent this. In fact, there is a heading in the Outline Operation Management Plan Paragraph 4.46 Suicide and Self Harm Prevention. The is no description. The paragraph is blank.

I am sure that eventually someone will write something about cutlery and removing sharp objects.

All the determined asylum seeker will need to do is take a high-visibility vest if encouraged to do so, walk through the main gate, take 40 steps towards the road and wait for a suitable vehicle…….

Please reject this application and save lives.

[redacted]

[redacted]

[redacted]

Piddington

Bicester

Oxon

[redacted]

12th September 2026

59. [redacted]

Address: [redacted], [redacted], Piddington, Bicester, Oxon, [redacted]
Date: 10th September 2026

I strongly object to this planning proposal and I would like to express my main concern.

I moved to Piddington 49 years ago with my husband and our eighteen- month-old daughter. Our second daughter was born two months after we moved in. We have enjoyed the peace and tranquillity of our garden and the village. We have been able to walk safely down the lanes of Piddington and across the fields with our daughters and more recently with our granddaughters. These walks have regularly been alongside the boundary fence of the MOD Site A, along Widnell Lane and Dark Lane as well as in Jubilee Park, the village Playing Field. Our granddaughters have particularly enjoyed using the green gym equipment located next to the boundary.

The Planning Application describes the use class as C2A - Secure Residential Institutions. This is the class used for detention centres and prisons. Yet, we have found that the site will not be secure. The Home Office fact sheet describes the site as "non-detained" and that migrants will be "free to come and go." I fear that this would allow them to wander freely day and night.

The planning proposal does not contain any details of how the Home Office plans to ensure public safety and security.

The government's fact sheet providing guidance on the MOD Bicester Site A (updated 9th September 2026) Para7"How will the Home Office ensure public safety and security?" demonstrates that no additional thought or consideration has been given to this subject in respect of this site. The paragraphs are exact copies of the text used in both fact sheets for Wethersfield and Crowborough sites.

I am being asked to accept that everything will be fine, there will be no safety or security issues and that the police will be able to protect the village. And yet:

1. The police were not consulted on these plans.
2. The wives and children of migrants held in this site will be housed elsewhere because the Home Office deems it to be unsafe for them to be housed on site.
3. The Home Secretary has stated that sites of this type should not be located close to schools.
4. The Bicester Garrison Commander has written to the Garrison's families saying that "they will be protected".
5. The Home Office decided it was necessary to publish a booklet on 19th August 2026 "Understanding behaviours and expectations in the UK: a guide for asylum seekers" including sections on "respect in public" and "sex and consent."

If this proposal proceeds, I feel that it will no longer be possible for me, my children and grandchildren to walk safely in the village or be in our garden in full view of the anyone walking along the road.

Please reject this application to protect the safety of the men, women and children of Piddington.

[redacted]

[redacted]

[redacted]

Piddington

Bicester

Oxon

[redacted]

60. [redacted]

Address: [redacted], Piddington, Oxfordshire, [redacted]
Date: 12 September 2026

FORMAL OBJECTION TO URGENT CROWN DEVELOPMENT APPLICATION

Reference: PCU/RARE/C3105/3378843

MOD Bicester Site A, Piddington

Dear Sir/Madam,

I am writing to formally object to application PCU/RARE/C3105/3378843 for the proposed development of MOD Bicester Site A for temporary non-detained asylum accommodation.

I strongly object to this proposal on the grounds of its impact on the existing community, lack of adequate infrastructure, road and pedestrian safety, environmental and ecological consequences, air quality, long-term sustainability and the significant public expenditure involved.

I also believe the planning history of this site, including the previous proposal for asylum accommodation in 2002/2003, must be given substantial consideration.

My family chose to move to the village because of the qualities that make village life so valuable: safety, cleaner air, access to nature, a strong sense of community and the opportunity for our children to have a degree of independence.

These were not incidental lifestyle choices. They were important reasons for choosing this area as our home and for raising our children here.

Our children are able to enjoy the outdoors, walk and cycle locally and develop independence

A development of the scale proposed has the potential to fundamentally alter those qualities.

I am concerned that the impact on existing residents is being treated as secondary to the Government's objective of finding accommodation, when the two issues should be considered together.

The proposal would provide accommodation for up to approximately 1,256 asylum seekers, together with staff and associated services.

This is effectively the introduction of a substantial new population into the area.

My concern is that the necessary infrastructure has not been demonstrated to exist at the level required to support a development of this scale.

There needs to be clear evidence demonstrating how the area will cope with the additional demand on:

local roads; pedestrian and cycling infrastructure; public transport; healthcare and GP services; emergency services; utilities; wastewater and drainage; refuse and waste services; local amenities; community facilities; and other public services.

The infrastructure needs to be demonstrated, assessed and appropriately provided before the facility becomes operational none of this has happened based on the application.

If the Government proceeds with this development, the additional costs and pressures must not simply be transferred to the existing local community or local authorities.

Safety is one of the principal reasons my family chose to live in the village.

I am particularly concerned about the effect this proposal could have on children's ability to safely walk, cycle and move independently around the area.

A facility accommodating up to 1,256 people will inevitably generate additional movements involving residents, staff, contractors, visitors, taxis, buses, deliveries and emergency vehicles.

This needs to be considered in terms of the actual roads and paths surrounding the site and the way that people currently use them.

Our children should not lose the independence they currently enjoy because a large-scale facility has been placed in an area that was not designed to accommodate such a population.

I therefore believe that a comprehensive assessment of pedestrian safety, cycling safety, traffic movements, road capacity and emergency access is essential.

The village currently benefits from its relatively rural setting and cleaner air.

The proposed development would introduce additional traffic, vehicle movements, construction activity, generators running 24/7 and infrastructure into an area that currently has a substantially different character.

I am concerned about the impact this will have on local air quality.

The environmental assessment should not simply consider the immediate construction footprint. It should consider the longer-term consequences of the proposed use and the associated increase in traffic and activity.

I am also deeply concerned about the potential impact on the local ecology.

The land provides habitat and forms part of a wider ecological network. Development can result in the loss or fragmentation of habitats, disturbance to wildlife, impacts on biodiversity, changes to drainage and loss of soil and vegetation.

These impacts need to be considered cumulatively rather than assessing individual habitats or species in isolation.

Once established ecological assets are damaged or lost, they cannot necessarily be recreated elsewhere with equivalent value.

The Government should therefore provide robust evidence demonstrating that the development will not result in unacceptable long-term ecological harm.

One of my greatest concerns is that the proposal has not adequately demonstrated what its impact will be on the existing community over the full proposed period of operation and beyond.

Although the proposal is described as temporary, a ten-year period is a significant proportion of a child's life and a substantial period for any community.

Temporary does not mean insignificant.

The decision-maker needs to consider what the consequences will be over 10 years, including:

pressure on local services; increased traffic; road safety; impact on children's independence; changes to the character of the area; environmental impacts; community facilities; healthcare provision; emergency services; waste and utilities; noise and disturbance; and the cumulative effect alongside other development in the Bicester area.

There also needs to be a clear plan for what happens to the site and its infrastructure at the end of the temporary period.

The 2003 planning history must be considered

There is a particularly important precedent involving this same site.

An asylum accommodation proposal was previously considered in 2002/2003, with a public inquiry taking place between December 2002 and March 2003.

The Planning Inspector recommended that permission should not be granted. Although the then First Secretary of State subsequently disagreed with the Inspector and approved the proposal, Cherwell District Council challenged that decision through judicial review.

The previous proposal therefore generated significant planning scrutiny, local concern and public expenditure.

That history should not be disregarded simply because the current proposal is being brought forward through a different planning mechanism.

The Government should explain clearly what has materially changed since 2003 and why the concerns identified at that time should not apply now.

Indeed, the scale of the current proposal makes that question even more important.

There is also a significant question concerning the use of public money.

The previous proposal resulted in substantial expenditure and legal proceedings.

The current proposal will also involve significant public expenditure, including site preparation, construction, accommodation, infrastructure, security, staffing, utilities, healthcare, welfare services and eventual decommissioning or reinstatement.

Given the scale of this expenditure, the Government should demonstrate that the site represents a properly assessed and economically responsible use of public funds.

I would ask that the full financial implications are made transparent, including:

capital costs; operating costs; infrastructure costs; healthcare and welfare costs; security costs; transport costs; environmental mitigation; costs falling on local authorities and public services; and eventual decommissioning or reinstatement costs.

It should not be assumed that because expenditure is being undertaken by central Government, it does not have an impact on the public or local community.

It is still taxpayers' money.

The Crown Development process should not mean reduced scrutiny

I recognise that the Government has powers to use the Urgent Crown Development process.

However, the use of that process should not mean that legitimate concerns regarding infrastructure, safety, environmental impact and community capacity are given less weight.

The fact that Cherwell District Council is acting as a consultee rather than the ultimate decision-maker does not make the impact on local residents any less real.

Residents will live with the consequences of this decision every day.

The Government therefore has a responsibility to ensure that the same level of rigorous assessment is undertaken that would reasonably be expected for a development of this scale under the normal planning process.

A fundamentally different environment from that required to support this proposal

The location of the site is particularly concerning.

This is not an established urban accommodation facility with extensive public transport, healthcare, community facilities and pedestrian infrastructure immediately available.

It is a site within and around a community whose existing infrastructure and character have developed around a very different scale of population.

The proposed accommodation could therefore create a significant mismatch between the scale of the facility and the infrastructure available to support it.

The answer cannot simply be that the facility is temporary.

Ten years is a substantial period for local residents, families and children.

Conclusion

I recognise that the Government has a responsibility to provide appropriate accommodation for people seeking asylum.

However, that responsibility must be balanced against the legitimate interests of the communities in which such accommodation is located.

Our community should not be expected to absorb a development of this scale without the necessary infrastructure, services and safeguards being properly demonstrated and provided.

My family chose this village because of its safety, cleaner air, access to nature, community and the independence it gives our children.

Those qualities have genuine value.

I am deeply concerned that this proposal risks undermining them while placing substantial additional demands on roads, public services, infrastructure and the environment.

The fact that the proposal is being pursued through the Crown Development process should not remove the need for rigorous assessment of its consequences.

The previous asylum accommodation proposal at this site in 2002/2003 demonstrates that these concerns are not new. The Government should learn from that history rather than simply repeating it.

I therefore respectfully request that application PCU/RARE/C3105/3378843 is refused.

Alternatively, if the Government is minded to proceed, I ask that no permission or commencement is allowed until there has been full and transparent assessment of:

1. the capacity of local infrastructure;
2. road, pedestrian and cycling safety;
3. air quality and traffic impacts;
4. healthcare and emergency-service capacity;
5. ecological and biodiversity impacts;
6. the cumulative impact of development in the Bicester area;
7. the long-term effect on the existing community;
8. the full financial cost to the taxpayer and local public services;
9. the lessons and evidence from the 2002/2003 planning process; and
10. the arrangements for the site at the end of the proposed ten-year period.

Above all, I ask the Government to recognise that a community is more than a site on a planning map. The safety, wellbeing, environment and quality of life of the people who already live here must form a meaningful part of this decision.

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

61. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: 8 September 2026

PERSONAL REPRESENTATION

Formal objection to Urgent Crown Development Application

PCU/RARE/C3105/3378843 | MOD Bicester Site A

Submitted by [redacted]

Address [redacted], Piddington, Bicester, [redacted]

Email [redacted]

Date 8 September 2026

Submitted to Crown Casework Team, Ministry of Housing, Communities and Local Government

Submission email crowncasework@communities.gov.uk

Dear Crown Casework Team,

I am writing to submit my formal objection to Urgent Crown Development Application PCU/RARE/C3105/3378843 for the proposed use of MOD Bicester Site A as asylum accommodation.

I am a resident of Piddington, the community closest to the proposed site. I am therefore directly affected by the likely consequences of the proposal, including pedestrian and highway safety, pressure on local services, drainage and flood risk, landscape and lighting effects, and the practical impact of placing a large residential population at an isolated former military site.

This is a planning objection. It is not an objection to people seeking asylum. I recognise the national need for suitable accommodation, but that need does not remove the requirement to choose a safe and suitable location, provide reliable evidence, assess the effects on neighbouring communities and the environment, and secure the infrastructure required before occupation.

The urgent Crown development procedure changes the route and timetable for determining the application. It does not make missing evidence immaterial, nor does it justify leaving fundamental questions to be resolved after permission has been granted. On the information presented, I do not consider the decision maker can be satisfied that the proposal is acceptable.

I respectfully request that the application be refused for the following reasons.

1. The claimed urgency has been overtaken by events

The application relies heavily on urgency as a reason for accelerated determination. However, the public ministerial statement dated 13 August 2026 states that the Home Office no longer intends to use MOD Bicester for asylum accommodation. That materially changes the factual basis on which urgency was advanced.

If the proposed use is no longer intended, there is no credible justification for asking the Secretary of State to determine a complex and locally significant application on an urgent timetable. The application should be withdrawn or refused. At the very least, no decision should be made until the applicant has provided a clear, current and formally authorised statement explaining whether the

proposal remains live, why permission is still sought, and what public purpose would now be served by granting it.

2. The location is inherently unsustainable for residential occupation

Site A is an isolated former military site, physically separated from ordinary settlement facilities. The application proposes a substantial residential population in a place without the characteristics or infrastructure of a sustainable settlement.

Residents would need access to healthcare, shops, legal and support services, education or training, places of worship, recreation and transport. Those needs do not disappear because the accommodation is described as temporary. The proposal would create dependence on organised transport, taxis, walking along constrained rural routes, and services brought to the site.

The application has not demonstrated that these arrangements would be reliable, adequately funded, enforceable and maintained throughout the occupation. A transport or management promise is not a substitute for a suitable location.

3. Pedestrian and highway safety risks have not been resolved

The route between the site, Piddington and the surrounding road network includes narrow rural roads, bends, limited visibility, constrained verges and sections without continuous footways. These roads were not designed to support the regular pedestrian movements associated with a large residential population.

Even if residents are encouraged to use organised transport, some independent walking and cycling is foreseeable. People may travel at different times, including after dark, or when scheduled transport is unavailable. A sound assessment must consider actual and reasonably foreseeable behaviour rather than assuming complete compliance with a travel plan.

The information submitted does not demonstrate a continuous, safe and accessible pedestrian route to essential destinations. Nor does it show that conflicts between pedestrians, cyclists, buses, service vehicles, staff traffic and ordinary rural traffic can be acceptably managed.

4. The Transport Assessment is incomplete

Transport is central to the acceptability of this proposal, yet important operational assumptions remain uncertain or are left to future management. These include the number and timing of staff movements, service and delivery traffic, medical and emergency journeys, visitor movements, waste collection, bus capacity, evening and weekend provision, and the consequences of missed or cancelled services.

The assessment should test realistic worst-case conditions and cumulative movements, not rely on optimistic assumptions about behaviour. It should also explain how the transport arrangements would be funded, monitored and enforced for the whole period of use, and what corrective measures would follow if the assumptions prove wrong.

Without that evidence, it is not possible to conclude that the highway network would operate safely or that the site would be accessible in practice.

5. The electricity supply and generator impacts are unresolved

A residential facility of this scale requires a dependable electricity supply for heating, lighting, cooking, communications, security, water and drainage systems, healthcare functions and general

welfare. The application material does not establish a completed and dependable permanent connection before occupation.

If temporary diesel generation is required, the environmental and amenity consequences must be assessed before permission is granted. These include noise, vibration, exhaust emissions, fuel storage, tanker deliveries, fire risk, spill response, maintenance and resilience during failure. The location, number, output and operating hours of generators also need to be specified.

A condition requiring details later would defer the assessment of a potentially continuous and significant impact. The decision maker should not assume that a technically feasible future solution is necessarily environmentally acceptable.

6. A workable foul drainage solution has not been established

The proposed use would generate substantial and continuous foul-water flows. The application does not establish, with sufficient certainty, the final means of disposal, capacity, maintenance arrangements, contingency measures and environmental safeguards.

If a mains connection is proposed, its availability and capacity should be confirmed. If treatment plants, holding tanks or tankering are proposed, the application must address siting, odour, noise, vehicle movements, breakdown, overflow, pollution risk, maintenance and emergency response.

Foul drainage is essential infrastructure, not a secondary detail. Occupation should not be authorised where the disposal system is undefined or depends on a later approval process that could reveal unacceptable impacts.

7. Surface-water drainage and flood risk remain uncertain

The development would alter the use and intensity of a large previously developed site and introduce vulnerable residential occupation. The drainage evidence must demonstrate how rainfall will be managed during ordinary and extreme events, how exceedance flows will be routed, and how the system will avoid increasing risk to neighbouring land and communities.

This is particularly important given local experience of drainage and flooding concerns. The assessment should address climate-change allowances, maintenance responsibility, blockage or pump failure, pollution interception and the interaction between surface water, foul drainage and existing site infrastructure.

The information submitted does not provide sufficient confidence that the proposed arrangements are complete, deliverable and safe for the full life of the development.

8. The ecological evidence is incomplete

The application acknowledges the need for further ecological work. Where surveys are seasonally constrained or incomplete, the absence of recorded harm cannot be treated as evidence that harm will not occur.

The site and its surroundings may provide habitat or movement corridors for protected and notable species. The effects of occupation, construction, lighting, noise, traffic, vegetation clearance, drainage changes and increased human activity must be assessed together.

Mitigation must follow adequate baseline evidence. It is not sound to grant permission first and rely on later surveys to determine whether the proposal is acceptable or whether effective mitigation is possible.

9. Potential effects on Arncott Bridge Meadow SSSI require greater scrutiny

The proximity of Arncott Bridge Meadow Site of Special Scientific Interest requires a precautionary approach. Potential pathways include changes to water quantity or quality, polluted runoff, disturbance, lighting, recreational pressure and indirect effects arising from a substantially more intensive use of the site.

The application should demonstrate, using complete evidence and consultation with the relevant nature conservation body, that the notified interest features would not be harmed. Generic management measures or assumptions about resident behaviour do not provide the same assurance as a completed impact assessment.

10. Ground contamination, asbestos and unexploded ordnance risks are material

Former military land can present complex risks, including contaminated soil, fuel residues, asbestos-containing materials and unexploded ordnance. These matters are particularly important where buildings and land are to be used for residential accommodation.

The decision maker should have a clear understanding of the investigations completed, the risks identified, the areas that remain inaccessible or uncertain, the remediation required, and the validation process. Construction workers, future residents, staff, visitors and neighbouring land must all be protected.

Conditions can control an established remediation scheme, but should not be used to postpone the basic question of whether the land can be made suitable for the proposed use within the proposed programme.

11. Archaeological impacts have not been adequately resolved

The site lies within an area with known archaeological potential. Works for utilities, drainage, foundations, roads, security and landscaping may disturb surviving remains even where much of the land has previously been developed.

The application should provide enough evaluation to identify the significance of likely remains and the effect of the development. A later watching brief is not an adequate substitute where important archaeology may require preservation in situ or changes to the scheme.

12. Landscape, lighting and tree effects require fuller assessment

The proposed use would introduce sustained residential activity, security infrastructure, external lighting, vehicle movements and potentially generators and other plant into a rural setting. Night-time effects may be markedly different from the site's previous pattern of use.

The lighting strategy should identify illumination levels, columns and fittings, hours of operation, security requirements, spill, glare and effects on nearby residents, road users, wildlife and the wider landscape. Existing vegetation cannot simply be assumed to provide permanent screening.

Tree and hedgerow protection, root constraints, future management and replacement planting should be established before permission, together with enforceable measures to prevent incremental loss of screening.

13. The effects on healthcare and community infrastructure are not resolved

A large accommodation facility would create additional demand for primary care, urgent care, mental-health support, dentistry, pharmacy, safeguarding, policing, ambulance services and voluntary support. The relevant question is not only whether provision could be arranged in principle, but whether sufficient capacity, staffing, funding and access would exist from the first day of occupation.

The application should contain clear, agreed arrangements with responsible service providers and identify the consequences for existing communities. An operational management plan prepared later cannot create clinical capacity or guarantee that external agencies have the resources needed.

14. Equality and accessibility have not been demonstrated

The future resident population may include disabled people, people with mobility or sensory impairments, older people, pregnant women, children, and people with significant physical or mental-health needs. An isolated site creates particular challenges for access to services and independent movement.

The application should demonstrate accessible accommodation, routes, transport, information, healthcare access and evacuation arrangements. It should also consider whether reliance on scheduled transport disproportionately disadvantages people who cannot use it easily or whose appointments and support needs fall outside the timetable.

15. Fire safety and emergency planning require certainty before occupation

The proposal involves residential occupation at scale in a former military complex. The application should establish safe means of escape, fire-water availability, emergency vehicle access, assembly arrangements, evacuation support for vulnerable residents, coordination with emergency services and resilience if power or communications fail.

These are not matters that should remain at a high level until after planning permission. Site layout, occupancy, building configuration, access controls and utility arrangements may all affect whether a safe solution is achievable.

16. Too many fundamental matters are deferred

Taken together, the application leaves central questions to later surveys, approvals, management plans or conditions. These include transport operation, electricity, generators, foul drainage, surface-water drainage, ecology, contamination, archaeology, lighting, health provision and emergency arrangements.

Planning conditions are appropriate where the principle and likely effects of development are understood and only detailed implementation remains. They are not an adequate response where the missing information is needed to decide whether the development is acceptable at all.

The cumulative effect of these gaps is especially serious. A solution to one problem may worsen another, for example tankering may increase traffic, generators may increase noise and fuel deliveries, and lighting required for security may increase landscape and ecological harm. Those interactions need assessment before a decision.

17. Previous planning approval does not establish the acceptability of this proposal

Any previous permission for development at the site must be considered in its own factual and policy context. A large institutional residential use has different occupancy, movement, service, welfare, security and infrastructure characteristics from other uses.

The current application must therefore be assessed on its own merits and on current evidence. The existence of an earlier permission does not answer whether this proposal is sustainable, safe or suitably serviced.

Conclusion and requested action

The application asks the decision maker to accept an unsuitable and isolated location while postponing many of the matters that determine whether it could operate safely. The claimed urgency has also been materially undermined by the Government's statement that the site is no longer intended for asylum accommodation.

I therefore respectfully request that the application be refused.

If the application is not refused or withdrawn, I request that no decision be made until all outstanding evidence has been supplied, independently reviewed where appropriate, published for public inspection, and subjected to a fair period of further consultation. That evidence should include, at minimum:

- a definitive statement of the current need for and status of the proposal;

- a complete transport and pedestrian-safety assessment based on realistic behaviour and operating conditions;

- confirmed electricity, foul-drainage and surface-water solutions;

- completed ecological, contamination and archaeological investigations;

- detailed lighting, landscape, tree-protection and noise information;

- agreed healthcare, safeguarding, emergency and fire-safety arrangements; and

- a single coordinated assessment of the cumulative effects of the development.

Please acknowledge receipt of this representation and confirm that it will be placed before the decision maker and taken into account in determining the application.

Yours faithfully,

[redacted]

[redacted], Piddington, Bicester, [redacted]

[redacted]

Principal official sources

Crown development guidance: https://www.gov.uk/guidance/crown-development

National Planning Policy Framework: https://www.gov.uk/guidance/national-planning-policy-framework

Adopted Cherwell Local Plan 2011-2031: https://www.cherwell.gov.uk/info/83/local-plans/376/adopted-cherwell-local-plan-2011-2031-part-1

Ministerial written statement concerning MOD Bicester: https://assets.publishing.service.gov.uk/media/6a97de7b3b22fb169dc19044/Written_statement_Bicester_HO.pdf

Application Transport Assessment:
https://assets.publishing.service.gov.uk/media/6a915bdf3b22fb169dc18f3f/Transport_Assessment.pdf

62. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: not stated

Dear Crown Casework Team,

I am writing to submit my formal objection to Urgent Crown Development Application PCU/RARE/C3105/3378843 concerning the proposed use of MOD Bicester Site A as asylum accommodation.

My address is:

[redacted]

Piddington

Bicester

[redacted]

I live in Piddington with my young family, in the community directly adjacent to the proposed site.

I am not objecting to people seeking asylum. My concern is whether this is an appropriate location for accommodation of this scale and duration, and whether the application has properly addressed the consequences for the surrounding community.

Piddington is a very small rural village with limited amenities. It has a village hall and recreation ground, but no shops or wider range of services.

1. Scale and suitability

The proposal would accommodate up to 1,256 people for as long as 10 years.

Although the Home Office intends the site to be largely self-contained, there would still be regular movement to and from it by residents, staff, security personnel, contractors, deliveries and service vehicles.

A development of this size and duration should therefore be assessed as a substantial long-term use of the site and against the realities of the rural location immediately beside it.

2. Transport and pedestrian safety

The surrounding road network is rural and was not designed to serve a residential facility of this scale.

The development would generate additional traffic from staff, contractors, deliveries, waste collection, taxis and other service vehicles.

There is also no continuous safe footway between the proposed site, Piddington and surrounding destinations.

The application should clearly demonstrate where residents are expected to walk, what routes they would use and how those journeys can be made safely.

3. Electricity, generators and drainage

The adequacy of the electricity supply must be demonstrated.

If generators are required, the application should identify their number, location, operating hours, noise, emissions, fuel storage, fuel deliveries and maintenance requirements.

The application should also explain how foul and surface-water drainage will operate and what contingency arrangements would apply if systems fail or require maintenance.

If wastewater tankering is required, those HGV movements should be included within the transport assessment.

4. Ecology, lighting and land condition

The site and surrounding countryside form part of a sensitive rural environment.

The effects of construction, lighting, fencing, vehicle movements and long-term occupation should be properly assessed.

Any outstanding ecological surveys, contamination risks, unexploded ordnance concerns or archaeological investigations should be resolved before permission is granted.

A detailed lighting strategy should also address the effects of security and operational lighting on residents, landscape character and wildlife.

5. Healthcare, fire safety and emergency resilience

The application should make clear which healthcare and support services will be delivered on site and which will rely on existing provision elsewhere.

Fire-safety arrangements should include emergency access, water supply and evacuation.

There should also be robust plans for power failure, water-supply failure, drainage failure, fire, extreme weather, medical incidents, security incidents and evacuation.

These issues should be resolved before the development becomes operational.

6. Community safety and village life

Residents would not be detained and would be free to leave the site while their asylum claims are still being processed.

I believe it is reasonable to ask what assessment has been made of safeguarding, policing, movement from the site and incident response, particularly given the size and rural nature of Piddington.

This is not an assumption that individuals will present a risk. It is a request for clear evidence about how a development of this scale would operate safely alongside the existing community.

I am also concerned about the possibility of protest activity and attention from extremist or far-right groups. Similar asylum accommodation proposals elsewhere have attracted demonstrations and significant policing requirements. That potential impact should also be considered.

The personal effect on my family is important. The recreation ground is the only shared green space available to our community. My four-year-old son loves football and this is where he goes to kick a ball and play.

I also regularly run through the village and along the surrounding rural lanes, including by myself in the evenings.

If this proposal meant that I no longer felt able to use these spaces with the same confidence and freedom, or felt I had to change where or when my children played or when I ran alone, that would materially affect our everyday family life.

7. Cumulative impact

The effects of this proposal should not be considered separately.

Generators may create noise, emissions and fuel deliveries. Drainage constraints may create tanker movements. Off-site services may create additional traffic. Security arrangements and protest activity may increase policing and operational demands.

The cumulative impact on Piddington and the surrounding rural area should therefore be fully assessed.

8. Urgency must not replace proper scrutiny

I recognise the Government's need to provide asylum accommodation.

However, the Urgent Crown Development process should not reduce the level of evidence required to demonstrate that a site is suitable.

A proposal of this scale and duration requires proper scrutiny, particularly where significant infrastructure, environmental, safeguarding and safety questions remain unresolved.

Conclusion

For these reasons, I do not believe the application demonstrates that MOD Bicester Site A is an appropriate or sustainable location for accommodation on the scale proposed.

I therefore ask that the application be refused unless and until the outstanding concerns around transport, pedestrian safety, infrastructure, ecology, emergency resilience, community safety and the cumulative impact on Piddington have been properly addressed.

Yours faithfully,

[redacted]

[redacted], Piddington, Bicester, [redacted]

63. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]
Date: 14th September 2026

Formal Objection to the proposed plans for MOD Bicester Site A

Application reference number

PCU/RARE/C3105/3378843

Name

[redacted]

Date

14th September 2026

Address

[redacted]

[redacted]

Piddington

Oxfordshire

[redacted]

Dear Crown Development Casework Team

I am writing to you as a resident of Piddington, having lived here for 16 years to formally object to the proposed development of MOD Bicester Site A .

I have restricted my comments to important observations I have , over a number of the papers provided , regarding the proposed site and why I believe that the process has been rushed and simply does not provide enough information for a sensible planning decision to be made .

Process

This has clearly been a rushed process, with the papers included within the pack, showing gaps, inconsistencies , redactions and a number of errors .

It also pushes a number of crucial planning documents into the future, beyond the decision making timetable . These are critical reports, that if they had been provided would need serious consideration and may well lead to the planning application being rejected as they were previously in the early 2000's .

I really cant see how planning can be agreed without , a number of very basic reports being available to consider and strongly believe that simply making planning subject to future crucial reports is unacceptable , I list below some of the crucial reports missing .

The ecological reports

The papers show this as still only preliminary , with fieldwork being done between 26th March and April 10th.

Access was limited , some buildings were inspected externally only . Important areas were not fully examined .

The documents highlight the need for further surveys and checks for bats, barn owls, breeding birds and other protected species .

The reports needed ,seem to have been pushed back potentially beyond the planning decision date and into periods not recommended for bats surveys for example . Why are the reports not available, we are now September the 14th, over 5 months have elapsed since the preliminary reports were provided ?

Given some of the species are protected by law . I know from my own experience that the area has a lot of bats (I have them around my house) , how can any decision be made without these crucial reports to hand .

My request here is simple, please do not make a decision , until all the ecological reports required for a normal planning application have been received.

Basic site services

At least 9 reports are missing , to cover very basic and crucial planning considerations , they include, the contamination investigation , the long term supply of power, the long term fowl solutions, surface drainage solutions , boundary and security , external lighting plans as well as the ecological reports mentioned above .

Given the sheer scale of the proposed site, how can a decision be made , without a full understanding of all these crucial basic amenities and the impact on both the area, the risk for site users and the ecological impact and the impact on local villages .

My request again is , delay any decision until a proper job has been done and all reports have been received , allowing a proper assessment of the overall site plan .

Highways , access and pedestrian safety .

The proposed site leads straight onto the Thame Road (the documents refers in several places to the B1104 , a road in Essex!) this road in many places has either no foot way or if it does , the foot ways are now more than one metre wide . The department of transports own guide line recommends at least two meters .

The road has around 3000 cars a day passing the proposed site with average speeds of 53 to 54 miles an hour, the application acknowledges that this is dangerous for site users and says that anybody leaving by foot will be provided with high vis jackets . The road has also had a recent fatality in 2024 .

Let me share some other information which I am aware of as both a runner and dog walker . I have on a few occasions either run along the Thame Road or needed to walk back along the road with my dogs, after my car broke down.

It is highly dangerous , the foot ways referred to above , are not all on the same side of the road, meaning either walkers / runners have to risk using the road itself or crossing the road, the foot ways are also often over grown dependent on the time of year . I was terrified when I had to navigate my way back to Piddington with my 2 dogs , in my view site users should not be allowed to walk anywhere, without the whole road being upgraded with appropriate path ways .

In conclusion , this feels like an enormous decision for the area, it feels rushed and the quality of the papers available are sub standard, with most of the key reports not yet being available for review. It also is a site which is in my view totally underprepared for such a large number of site users, without huge investment in basic services and a massive upgrade in the road safety arrangements . It's clear to me, that no decision can or should be made without all the relevant and crucial reports being available for review.

Yours faithfully

[redacted] (resident of Piddington)

64. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: 13/09/2026

Application Reference: PCU/RARE/C3105/3378843

Date: 13/09/2026

Dear Sir/Madam,

I am writing to object to the proposed development at Site A, MOD Bicester.

My name is [redacted] and I live at [redacted], Piddington, [redacted]. I have lived in Piddington all my life and my family have also lived in the village for many generations.

My biggest concern is simply the number of people being proposed for the site. The proposal is for accommodation for up to 1,256 people, while Piddington currently has only around 350 residents.

That would mean putting more than three times the population of our entire village onto one site just outside it. I find the scale of that very difficult to understand or support, particularly in a rural area like ours.

This isn't just a small increase that the existing area can easily absorb. It would have a huge impact on the local roads, services, utilities and the character of the surrounding villages.

I am particularly concerned about road safety. I drive through the area early in the morning when travelling to work and know the local roads well. The roads around Piddington and the Thame Road/Widnell Lane route are not large roads, and I am concerned about the additional traffic that a development of this size would create, including staff, deliveries, minibuses and other vehicles.

I am also concerned about flooding and drainage. There are already concerns about surface water in the local area, and I don't think a development of this size should go ahead without being certain that the drainage system can cope and that it won't make flooding problems worse for people living nearby.

The same applies to water, sewage and electricity. Over 1,200 additional people would obviously put a huge amount of extra demand on local utilities. I am concerned that the existing infrastructure has not been properly demonstrated to be capable of supporting something on this scale.

Having lived here all my life, I feel very strongly that this proposal is simply far too large for this location. Piddington is a small village of around 350 people, and putting accommodation for up to 1,256 people immediately alongside it would completely change the scale and character of the area.

I therefore strongly object to the application and ask that the proposal is refused.

Yours faithfully,

[redacted]

[redacted]

Piddington

Bicester

[redacted]

65. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 13/09/2026

Application Reference: PCU/RARE/C3105/3378843

Date: 13/09/2026

Dear Sir/Madam,

I am writing to formally object to the proposed development at Site A, MOD Bicester.

My name is [redacted] and I live at [redacted], Piddington, [redacted]. I have lived in Piddington for 7 years, while my husband has lived here all his life, and we have strong family ties to the village and the surrounding area.

My main concern is the sheer scale of the proposed development. Accommodation for 1,256 people would be more than three times the current population of Piddington, which is only around 350 residents. I believe this is completely disproportionate to the size and rural nature of our village and would have a significant and lasting impact on the local area.

I am worried about the effect on road safety and the amount of additional traffic the development would bring. The surrounding roads are already relatively small and I am concerned that they are not suitable for such a substantial increase in vehicles, including staff, deliveries and minibuses.

As a mother, I am also extremely concerned about the safety of myself and my children. We regularly walk our dog locally, and our children enjoy playing in the surrounding fields and countryside. One of the things that makes living in Piddington so special is that children can enjoy a relatively carefree childhood, with the freedom to play outdoors and explore their surroundings. I worry that a development of this size, together with the increase in traffic and activity, would change that sense of safety and freedom for our children.

I am also concerned about drainage and flooding. There are already issues with surface water in the local area, and I do not believe a development of this scale should proceed without clear evidence that the existing drainage infrastructure can cope without increasing the risk of flooding to surrounding properties and land.

There are also serious concerns about whether local water, sewage and electricity infrastructure has the capacity to accommodate 1,256 additional people. I am concerned that the impact on these services has not been adequately demonstrated.

I feel strongly that this proposal is simply far too large for this location. It would fundamentally alter the character, scale and feel of our small rural village and the surrounding countryside.

For these reasons, I strongly object to the application and ask that the proposal is refused.

Yours faithfully,

[redacted]

[redacted]

Piddington

[redacted]

66. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 14.09.2026

Good evening,

My name is [redacted], a resident of Piddington, in Oxfordshire. My address is [redacted], Piddington, [redacted]

I am writing to you today to OBJECT the proposal to house 1256 single men at Site A on the edge of our beautiful village. As a tax payer into our state, I feel that I shouldn't need to be writing this after a similar application was thrown out over 20 years ago for a larger number of reasons, and at a cost in excess of £30m! Those reasons for it being thrown out then, haven't changed, and if anything, are more prominent than they were then.

My main objection to the site is scale! Increasing the population of a village overnight by over 350% is something has never been done before. It would have profound effects on the safety of the village as a whole, but most severely, the children and women.

Our local playing field is a place where people walk their dog, take their children, and simply go for a friendly walk together. That will not be possible if the site is approved.

The proposed site is on almost blind bend, where cars travel at great speed. Only last year, a family friend lost her 5-year-old son only a few yards from the site. There is very little light at night time, and the paths are minimal especially on the approach to the village.

The proposal has also failed to demonstrate how they will cope with flooding on site. The applicants have already confirmed that over a quarter of the site will be at 'high' risk of flooding at any point during the year.

The applicants haven't provided any evidence of how they intend to get power to site. This then leaves open the option that the site could run off of generators for many, many years meaning incredible high pollution for the local area.

Lastly, the wildlife on site. There are a number of different endangered species on site including bats, barn owls, breeding birds and other protected species.

We have lived here for 3 years, my wife's family have been here for 75 years and I am pleading with you to listen to us. I have 3 young children and they deserve a safe childhood.

Kind regards,

[redacted]

Piddington resident

[redacted], Piddington, [redacted]

14.09.2026

67. [redacted]

Address: [redacted], [redacted], [redacted]
Date: 14th September 2026

Subject: Formal OBJECTION – Site A, MOD Bicester – PCU/RARE/C3105/3378843

Dear Sir or Madam,

I am writing as a resident of Piddington to OBJECT formally to the proposed use of Site A, MOD Bicester, as

accommodation for up to 1,256 people.

My objection concerns the suitability of this particular site and the lack of adequate evidence that a development of

this scale can be delivered safely, sustainably and economically.

1. Scale and location

The proposed capacity is more than four times the population of Piddington. This would be an exceptionally large

development in an isolated rural location with limited infrastructure and public transport.

A smaller accommodation proposal in this area was previously found to be unsustainable because of its isolation,

pressure on local services and pedestrian-safety concerns. Those constraints remain, yet the current proposal is

substantially larger.

The preliminary unexploded ordnance assessment also refers to accommodation for 3,510 service users. This

significant discrepancy must be explained before the development's intended scale and consequences can properly

be assessed.

2. Water supply and wastewater

The application does not establish that sufficient water-supply or wastewater capacity is available. The applicant's

utilities assessment states only that potential capacity may exist at Bicester Wastewater Treatment Works, subject

to confirmation. There is no evidence of a firm commitment from Thames Water that the networks can

accommodate the additional demand.

There is no existing on-site wastewater treatment facility, while the foul-drainage strategy remains provisional.

These are fundamental infrastructure requirements which should be resolved before permission is granted, rather

than left until after the decision.

As a resident of 13 years, I can confirm that water pressure is already weak, with frequent outages. Any additional

pressure on the existing infrastructure will inevitably exacerbate this issue.

3. Power supply

The applicant acknowledges that the condition and capacity of the electrical network are unknown and that the

primary intake has not been verified. The development is expected to require approximately 2.16 MVA, with

heating, hot water and cooking all dependent on electricity because no gas supply is proposed.

Despite this, the application appears to rely on temporary and permanent generators rather than a confirmed grid

connection. Permission should not be granted without evidence of an adequate, resilient and deliverable long-term

power supply.

4. Road safety, particularly for children

I am particularly concerned about the safety of children (including my own) and other vulnerable road users. The

approach roads carry substantial traffic at recorded speeds of approximately 53–54 mph. Where a footway exists, it

is reportedly only around one metre wide, leaving inadequate separation between pedestrians—including children

and families—and fast-moving vehicles.

The development would generate additional movements by staff, coaches, minibuses, contractors and delivery

vehicles. Nevertheless:

• Widnell Lane, the direct route to Piddington, and a road my children use regularly, has apparently had no

traffic count, collision search or safety assessment;

• parts of the traffic evidence were taken from a different development in Essex;

• heavy-vehicle traffic was entered as zero in most modelling scenarios; and

• no proper assessment appears to have been made of routes used by children travelling to schools, sports

facilities or neighbouring villages.

The application also lacks detailed access and lighting proposals and a construction traffic management plan. It is

therefore impossible to assess fully the safety of pedestrians during either construction or operation.

An independent, site-specific road-safety audit should be required, covering Widnell Lane, the Thame Road, pedestrian

and cycling routes, crossing points, construction traffic and journeys made by children. Any necessary

improvements must be identified, funded and secured before the site is occupied.

5. Missing and inconsistent information

I am appalled that such an important (to us) proposal should be so poorly drafted. The application is not

sufficiently complete to support an informed decision. Missing information includes a detailed site layout,

dimensions and building heights, floor plans, elevations, lighting and fencing proposals, drainage arrangements,

confirmed access details and complete parking and staffing figures.

Long-term utility solutions remain unresolved, while intrusive investigations into contamination and unexploded

ordnance, protected-species surveys and other ecological work appear incomplete.

There are also inconsistencies concerning the site's existing use, floorspace, site levels, buildings to be

demolished, intended length of occupation and potential accommodation capacity. These are material matters

affecting safety, infrastructure requirements and the development's overall impact.

Site-specific capacity assessments do not appear to have been completed with the NHS, Thames Valley Police,

Oxfordshire Fire and Rescue Service, South Central Ambulance Service or the county highway authority. The

absence of detailed information about access, lighting, boundaries and firefighting water supplies also prevents a

proper assessment of public safety and emergency response.

Fundamental questions should not be deferred until after permission has been granted, particularly under an

expedited procedure with limited public consultation.

6. Value for the taxpayer

No adequate options appraisal has been published demonstrating why this site and a development of this scale

offer better value than smaller sites, dispersed accommodation or the reuse of suitable existing buildings.

The lack of confirmed utility capacity creates a clear risk of substantial additional expenditure on power

generation, water, drainage and highway improvements. The isolated location is also likely to result in significant

continuing transport, staffing, security and service-delivery costs.

A previous accommodation proposal in this area was abandoned as uneconomic after considerable public

expenditure. At a time when public finances are so stretched and before further public money is committed, the

decision-maker should require a transparent comparison of the development's full capital and operating costs,

infrastructure requirements, risks and reasonable alternatives.

Conclusion

The proposal's exceptional scale, unresolved utility requirements, inadequate highway and child-safety

assessment, extensive missing information and uncertain value-for-money case mean that its effects cannot

presently be assessed with reasonable confidence.

I therefore ask that the application be refused. At the very least, no decision should be made until:

• the missing evidence has been published and inconsistencies resolved;

• the relevant infrastructure providers and public authorities have completed site-specific assessments;

• an independent road-safety audit has been undertaken;

• all necessary infrastructure and safety improvements have been identified and secured; and

• residents have been given a meaningful opportunity to consider and respond to the completed evidence.

Please acknowledge receipt, confirm that this objection will be placed on the official case file, and keep me

informed of further developments.

Thank you for taking the time to read my objection.

Yours faithfully,

[redacted]

[redacted], [redacted], [redacted]

14th September 2026

68. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 14 September 2026

Dear Sir or Madam,

I wish to register my objection to the proposed accommodation centre at Site A, MOD Bicester.

I write as a woman, a mother and a Piddington resident. My concerns relate to the suitability of the location, the consequences for women and children living nearby, the adequacy of the supporting evidence and the proper use of public money. They are concerns about the planning and management of the development, not about the personal characteristics of those who may be housed there.

Disproportionate scale

Housing as many as 1,256 people at this site would introduce a population more than four times the size of Piddington into an isolated area served by rural roads and limited local infrastructure. That degree of change requires exceptionally careful scrutiny.

A previous, smaller proposal for accommodation nearby was considered unsustainable because of its isolation, pressure on services and pedestrian-safety implications. The present scheme is larger, but the underlying limitations of the location have not disappeared.

I am also concerned that one of the applicant's reports refers to 3,510 service users. The difference between that figure and the stated capacity of 1,256 is too substantial to overlook. The maximum intended capacity and any potential for later expansion must be clarified.

Safety and security for women and children

As a woman, I am concerned that the application contains insufficient information to judge how the development would affect the safe and confident use of local roads, paths and shared spaces.

No detailed external lighting, boundary-treatment, security, access-control or operational-management proposals appear to have been provided. Without these, it is impossible to understand how people would travel between the site and surrounding settlements, which routes they would use, how those routes would be supervised or illuminated, and how incidents or emergencies would be managed.

The practical effect on existing residents, particularly women and children, should be assessed before approval rather than addressed only after the centre opens. Thames Valley Police and the other relevant authorities should be asked to undertake and publish site-specific assessments covering community safety, policing requirements, access, lighting and emergency response.

Road safety and children's journeys

My greatest concern as a mother is the danger posed to children and other vulnerable road users.

Vehicles approaching the site travel at recorded speeds of around 50 mph. The available footway is reportedly only about one metre wide and substantial stretches of the surrounding road network offer inadequate pedestrian provision.

The development would create frequent movements by coaches, minibuses, staff, contractors and delivery vehicles. Yet the transport evidence does not provide a satisfactory assessment of Widnell Lane, the direct route towards Piddington. Nor does it properly examine the routes used by children and families travelling to schools, sports grounds or neighbouring communities.

The reliability of the modelling is also questionable because some baseline information was taken from a scheme in Essex and most scenarios assumed no heavy-vehicle traffic. Those assumptions do not reflect the likely operation of this development.

An independent local road-safety assessment should be completed before any decision is reached. It should cover pedestrian and cycling routes, safe crossing points, school and recreational journeys, construction traffic and the combined effect of staff, coach, minibus and

delivery movements. Any required footways, crossings, speed controls or other improvements should be provided before the site is occupied.

Water and sewage infrastructure

There is no firm evidence that the existing water and wastewater networks can support the proposed population. The applicant identifies only possible spare capacity at Bicester Wastewater Treatment Works, subject to confirmation, and the foul-drainage proposals remain provisional.

We already have weak water supply and a development intended to accommodate more than a thousand people should not proceed on the assumption that sufficient capacity will subsequently be found. Thames Water should first provide written confirmation of the available water supply, wastewater capacity and necessary infrastructure works.

Incomplete and contradictory evidence

Important elements of the proposal remain either absent or uncertain. These include the final site layout, building dimensions and heights, pedestrian access, parking and staffing information, external lighting, boundary treatment, security arrangements and drainage design.

There also appear to be inconsistencies regarding floorspace, site levels, existing buildings, the duration of the proposed use and the number of people who might ultimately be accommodated. Further investigations relating to contamination, unexploded ordnance and ecology also appear to remain outstanding.

In addition, no completed site-specific assessments appear to have been published from the police, fire and ambulance services, the NHS or the county highway authority. These omissions prevent a properly informed assessment of the development's effects on public safety, infrastructure and local services.

Expediting an application does not remove the need for reliable evidence. Matters central to the acceptability of the proposal should not be postponed until after the principle of development has been approved.

Cost to the taxpayer

I have seen no transparent comparison demonstrating that this location represents better value than smaller accommodation centres, dispersed provision or suitable existing buildings.

The site's isolation and unresolved infrastructure requirements could expose taxpayers to substantial additional costs for water and drainage works, transport, highway improvements, security, staffing, healthcare and emergency services. The experience of the earlier accommodation proposal in this area, which was abandoned as uneconomic, makes proper financial scrutiny particularly important.

Before public funds are committed, the full construction and operating costs should be published alongside the alternatives considered and the assumptions on which the preferred option was selected.

Conclusion

This proposal would bring an unprecedented change to a small rural community, but the information needed to assess its consequences—especially for the safety of women and children—has not been supplied.

I ask that permission be refused. At a minimum, determination should be postponed until the outstanding evidence has been produced, the police and other relevant authorities have completed site-specific assessments, an independent road-safety review has been undertaken, and residents have had a fair opportunity to consider and comment upon the resulting information.

Please confirm receipt of this objection, place it on the formal case record and notify me of any further consultation or decision.

Yours faithfully,

[redacted]

[redacted], Piddington, [redacted]

14 September 2026

Sent from my iPhone

69. [redacted]

Address: [redacted], Piddington
Date: not stated

Dear Secretary of State,

I am writing to formally object to planning application PCU/RARE/C3105/3378843, which seeks permission for a 1,256 person asylum accommodation facility at Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, [redacted].

For the reasons outlined below, I respectfully request that planning permission be refused.

A primary concern is that the application appears to be incomplete with several important technical and environmental matters still unresolved. Key assessments and investigations remain outstanding, leaving considerable uncertainty regarding issues such as fire safety, contamination, drainage, ecology and the overall suitability of the site.

I am particularly concerned about the lack of a thorough investigation into potential ground contamination. Earlier land quality studies identified the possibility of contamination; however, no borehole testing has yet been undertaken to fully assess the extent of any risks or to provide confidence that the site is safe for a development of this nature.

Flood risk and drainage arrangements also remain a significant source of concern. Parts of the proposed site are known to be susceptible to surface water flooding, while elements of the drainage strategy have yet to be finalised and adequately evidenced.

In addition, the transport information provided raises serious doubts. The Transport Assessment contains repeated references to an incorrect road, which calls into question the reliability of the analysis. Furthermore, the Thame Road, which provides access to the site, has limited pedestrian facilities and a documented record of serious road traffic accidents.

The application also fails to demonstrate that permanent solutions are in place for critical infrastructure requirements, including electricity supply and wastewater management. In my view, a proposal intended to accommodate up to 1,256 residents should not be approved while such essential matters remain unresolved.

The scale of the proposal is also a concern. The development would introduce a very large and disproportionate number of residents into a relatively isolated rural location that has limited public transport links, restricted local infrastructure and few services that can be reached on foot.

I am also troubled by the limited period allowed for public representations. Given the size and complexity of the proposal, residents, local authorities and technical experts have not been afforded sufficient time to properly review the application. The supporting documentation exceeds 1,000 pages and covers numerous specialist disciplines. It is unrealistic to expect all relevant parties to fully assess and respond to such extensive material within the timeframe provided. Standard planning applications typically allow a minimum consultation period of 21 days and Crown Development procedures generally provide 21 days at each stage. I therefore request that the consultation period be extended to at least 21 days from 7 September 2026 with the revised deadline falling on Monday 28 September 2026, as the 21st day would otherwise fall on a Sunday.

No comprehensive ecological assessment has been completed, despite evidence indicating that the site supports important wildlife habitats and protected species. Available evidence suggests the site is home to rare and legally protected species, including great crested newts and several species of rare bats, yet the ecological impacts of the development have not been fully assessed.

It is also relevant that this site has been considered previously for asylum accommodation. A smaller proposal was rejected by an independent Planning Inspector before ultimately being withdrawn.

When viewed collectively, these concerns lead me to conclude that the applicant has not demonstrated that Site A is an appropriate or sustainable location for a development of this magnitude.

Accordingly, I respectfully request that planning permission be refused.

Should the Secretary of State nevertheless be minded to grant approval, I ask that no decision be taken until all outstanding assessments and investigations have been completed and made publicly available for thorough review. This should include outstanding work relating to drainage, flood risk, wastewater, land contamination, ecology, highways, pedestrian safety, electricity supply, lighting, noise, fire safety and decommissioning arrangements.

Yours faithfully,

[redacted]

[redacted], Piddington.

70. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 13 September 2026

OBJECTION TO THE PROPOSED USE OF THE MOD SITE AT PIDDINGTON FOR MIGRANT ACCOMMODATION

Dear Sir/Madam,

Application reference: PCU/RARE/C3105/3378843

Date of response: 13th September 2026

I am writing to formally object to the proposal to use the MOD site at Piddington to accommodate approximately 1,250 migrants.

My objection is not based on the nationality, ethnicity or immigration status of the individuals who may ultimately be accommodated at the site. Rather, it concerns the exceptional scale of the proposed accommodation in relation to the existing size, infrastructure, facilities and capacity of Piddington and the surrounding rural communities.

I have outlined my formal objections below but I would like to summarise my main concerns as to what this proposal means for me, my family and the wonderful community in which I live.

This is a small, quiet hamlet. I do not exaggerate when I say that the community, particularly the women and children, are genuinely terrified as to what impact this will have on our safety, our services and our ability to carry on our lives in this village. I would like to flag that whoever signs off this proposal needs to be very clear as to the impact this will have; we have seen no risk assessment - my question is where is that assessment? That sign off comes with personal culpability if there is any adverse impact on the individuals in this village. God forbid that any harm should come to anyone here, but we have seen no evidence that those who are the decision makers have done the appropriate due diligence to enable them to avoid personal culpability.

I personally walk and cycle around this village on my own on a regular basis. I walk down to our reserve in the village daily, sometimes at dusk. I frequently walk through the village in the dark when I visit friends or take my dogs for a walk at night and early morning. We have very few pavements and very little street lighting, I currently use only a small torch. I would request that we are provided with a full risk assessment that addresses how our personal safety can be guaranteed if this proposal goes ahead.

How will more police emergency calls be handled, are the police to be allocated the additional resource to deal with more calls?

In addition, I am concerned as to the availability of services in the village and the impact this will have. Our water pressure is frequently low, we have many water main leakages that have necessitated numerous visits from Thames Water. Please provide an assessment as to the impact on water services including sewage.

We also have a lot of flooding in the village during some months of the year, with roads into the village frequently cut off. Please provide details of your impact assessment of the proposal on this.

My further objections are as follow:

1. Disproportionate scale

Piddington is a very small rural community with approximately 315 residents. The proposed accommodation of approximately 1,250 additional people would therefore represent an increase equivalent to almost four times the existing population.

The resulting population would be approximately 1,565 people, meaning that the existing community would be required to absorb a population almost five times its current size.

This is not a modest increase in population. It represents a fundamental change to the scale and character of the settlement and surrounding area.

It is therefore essential that the suitability of the proposal is considered in terms of its proportionality and impact upon the existing community and local infrastructure, rather than simply whether the physical MOD buildings are capable of containing the proposed number of people.

2. Lack of local facilities

Piddington does not have the facilities that would ordinarily be expected to support a population of this size.

There is no village shop, no public house or comparable local facility providing residents with everyday access to basic goods and services.

Consequently, a substantial number of the proposed residents would inevitably need to travel outside Piddington for basic necessities, healthcare, shopping, recreation and other services.

This raises significant questions regarding: the availability and capacity of public transport; traffic generation; pedestrian safety; access to healthcare; pressure upon neighbouring communities and their facilities; access to shops and essential services; the capacity of local public services; and the ability of the surrounding area to accommodate such a substantial additional population.

The proposal should therefore not be assessed solely on the basis of the site itself. Its impact upon neighbouring villages and the wider local area must also be properly considered.

3. Absence of pavements and pedestrian infrastructure

One of the most significant concerns is the lack of adequate pedestrian infrastructure within the village and surrounding roads.

Piddington is a rural settlement and does not have a comprehensive network of pavements capable of accommodating large numbers of pedestrians.

If 1,250 additional residents are placed at the site, there will inevitably be substantially more pedestrian movement between the site, public transport, neighbouring settlements and local facilities.

This creates legitimate concerns regarding highway and pedestrian safety, particularly where people are required to walk alongside rural roads without pavements.

A detailed and independent assessment should therefore establish: anticipated pedestrian movements; the routes likely to be used; the adequacy of existing footways; road crossing requirements; traffic speeds; visibility; accident risks; public transport access; and whether additional pedestrian infrastructure is required.

4. Inadequate street lighting

There is a further concern regarding street lighting, particularly where lighting is switched off overnight.

The combination of a large additional population, rural roads, limited pedestrian infrastructure and inadequate overnight lighting creates a legitimate road and pedestrian safety concern.

It would be unreasonable to expect significant numbers of people to walk through an unlit rural environment without first establishing that the routes are safe and suitable.

The relevant authorities should therefore provide evidence of a specific night-time pedestrian and highway safety assessment undertaken in light of the proposed accommodation.

5. Pressure upon healthcare and public services

An additional population of approximately 1,250 people would inevitably create additional demand for local services.

Questions must therefore be answered regarding the capacity of: GP surgeries; dentists; pharmacies; hospitals; ambulance services; mental health and welfare services; police; fire and rescue services; and other relevant public services.

It should not simply be assumed that existing services have sufficient capacity.

The proposal should be accompanied by clear evidence that the relevant service providers have been consulted and that the additional demand has been assessed and appropriately resourced.

6. Emergency services and access

The rural nature of Piddington also raises concerns about emergency access.

The authorities should demonstrate that the increased population can be adequately served by emergency services and that there are appropriate arrangements for: emergency vehicle access; evacuation; fire safety; medical emergencies; policing; safeguarding; and emergency communications.

The potential increase in demand should be assessed against the existing capacity of the relevant services rather than considered in isolation.

7. Impact on neighbouring communities

Because Piddington has very limited local facilities, many of the proposed residents will necessarily use facilities in neighbouring communities.

The proposal could therefore place additional pressure on nearby: shops; supermarkets; GP surgeries; dentists; pharmacies; bus services; railway stations; roads; public spaces; and emergency services.

It is therefore important that the assessment considers the cumulative impact across the wider area, rather than restricting consideration to the physical boundary of the MOD site.

8. Community cohesion and the character of the village

The introduction of a population almost four times the size of the existing community cannot reasonably be regarded as having no effect upon the character and functioning of the village.

Piddington has developed as a small rural community. Introducing a population of approximately 1,250 people would fundamentally alter the demographic and physical scale of the settlement.

This does not mean that the existing community is unwilling to welcome newcomers. Rather, it recognises that successful integration and community cohesion require appropriate scale, facilities, transport, services and resources.

A proposal of this magnitude requires a clear plan demonstrating how community cohesion will be supported and how both existing residents and new residents will be able to access appropriate services and facilities.

9. Suitability of the site

The fundamental question should be whether this is an appropriate location for accommodation on this scale.

The fact that the MOD site may contain buildings capable of being converted into accommodation does not, in itself, demonstrate that the location is suitable for 1,250 residents.

The suitability assessment should consider the whole environment in which the residents will live, including transport, healthcare, pedestrian infrastructure, lighting, shops, emergency services, recreation, access to support services and the impact upon surrounding communities.

A site which is physically capable of accommodating people is not necessarily a site which is socially, environmentally or infrastructurally suitable for accommodating them at this scale.

10. Request for full evidence and assessments

Before any decision is made, I would ask that the relevant authorities publish or make available the evidence and assessments underpinning the decision to identify Piddington as a suitable location.

In particular, I request evidence addressing: 1. Highway and traffic impact; 2. Pedestrian and road safety; 3. Night-time pedestrian safety; 4. Public transport capacity; 5. Healthcare capacity; 6. Police and emergency service capacity; 7. Fire safety and emergency evacuation; 8. Safeguarding; 9. Waste and refuse management; 10. Water, sewage and other utilities; 11. Environmental impact; 12. Community cohesion; 13. Impact upon neighbouring settlements; 14. The cumulative impact of the proposed population increase; and 15. Why a site accommodating approximately 1,250 people has been considered proportionate and appropriate for a community of approximately 315 existing residents.

Conclusion

I respectfully request that the proposal is reconsidered and refused, or that an alternative and more proportionate location is identified.

The issue is not whether migrants should receive appropriate accommodation. They should.

The issue is whether it is reasonable or sustainable to place approximately 1,250 additional people in a small rural community of approximately 315 residents which has no shop, no public house, limited local facilities, inadequate pedestrian infrastructure and limited overnight street lighting.

Such a substantial population increase requires substantially more than suitable buildings. It requires appropriate infrastructure, transport, healthcare, emergency provision, pedestrian safety measures, public services and a realistic strategy for supporting both the existing community and those being accommodated.

In the absence of compelling evidence demonstrating that these matters have been properly assessed and adequately addressed, I believe there are serious grounds to conclude that the proposed site is unsuitable for accommodation on the scale proposed.

I therefore respectfully ask that this objection is formally recorded and fully considered before any decision is made.

Yours faithfully,

[redacted]

[redacted]

Piddington

[redacted]

Piddington Parish (Cherwell Council)

71. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: 14 September 2026

[redacted]

[redacted]

Piddington

Bicester

[redacted]

14 September 2026

Planning Inspectorate Crown Development Casework Unit

Application reference: PCU/RARE/C3105/3378843

Dear Sir/Madam,

I am writing to object to the proposed development at Site A, MOD Bicester, which would provide accommodation for up to 1,256 single adult men.

I was born in Piddington and my family has been in the village for five generations. I know the village and the surrounding area very well, and I am very concerned about what a development of this size would mean for the village and the people who already live here.

I want to make clear that my objection is not about the people who may be accommodated at the site. My concerns are about the size of the development, whether the site is suitable, and whether the local roads, drainage, water, electricity and other infrastructure can cope.

Flooding is a particular concern for me because my own home flooded in 2008. I know from personal experience how serious flooding can be and the disruption and worry it causes. There has also been flooding across the Thame Road.

I am therefore very concerned that the proposed site itself is at high risk of surface-water flooding, with around a quarter of the site identified as having a high chance of surface-water flooding in any given year. I understand that the existing drainage ditches and pipework on the site have not been fully surveyed and that the drainage arrangements had not been finalised when the application was submitted.

Having already experienced flooding at my own home, I do not think this risk should be overlooked. I would like to see proper evidence that the development will not make flooding problems worse for the surrounding area or existing residents.

I am also very concerned about the water supply. Water pressure in the village can already be low at times and the system struggles now. Adding more than a thousand people to the area will clearly create a very large additional demand.

I want evidence that Thames Water's network can actually accommodate this demand. I understand that there is currently no written confirmation that the network has enough capacity for

a development of this scale. I do not think the development should go ahead until this has been properly confirmed.

There are also concerns about electricity. There is no gas supply proposed for the site, so heating, hot water and cooking would all depend on electricity. However, I understand that the capacity and condition of the electricity network serving the site are currently uncertain and have not been fully verified.

It concerns me that generators may be required because there is not yet a confirmed electricity supply. This is a very large development and I do not believe it is reasonable to rely on an uncertain local electricity supply without knowing whether it can cope with the demand.

I am also very worried about road safety and pedestrian safety.

The local roads are not designed for a development of this scale. I use the local area and want to be able to walk my dogs and take my grandchildren out without being worried about increased traffic and the safety of the roads.

I am particularly concerned that there has not been a proper site-specific survey of the local road network. The actual roads around Piddington need to be looked at properly, including the routes people use on foot. Existing pavements are narrow in places and traffic speeds are already a concern.

A development bringing up to 1,256 people to this location will inevitably mean more cars, minibuses, coaches, deliveries and other traffic. I do not believe the impact this will have on pedestrians and local residents has been properly considered.

The safety of people walking around the village needs to be taken seriously. I should not have to worry about whether it is safe to walk my dogs or take my grandchildren out because of the amount of additional traffic associated with the development.

I am also concerned about the wildlife around the site. There are many species of bats in the area, and I understand that some ecological surveys are still outstanding. I do not think a decision should be made until all the necessary surveys have been completed and the effect on local wildlife has been properly assessed.

The sheer size of this proposal is also very difficult to understand in the context of Piddington. Bringing up to 1,256 people into an area where the existing population is only around 350 residents would completely change the character of the local area.

I have lived here all my life and have seen how the village works and how limited some of our existing infrastructure is. It is difficult to see how a development of this scale can be accommodated without putting considerable pressure on roads, water, electricity, drainage and local services.

I am asking that these issues are properly investigated before any decision is made.

In particular, I would like to see:

- Proper investigation of the flooding and drainage risks, taking account of existing flooding in the area.

- Written confirmation from Thames Water that the water and wastewater networks can cope with the additional demand.

- Proper consideration of the existing low water pressure in the village.

- Evidence of a reliable electricity supply for the development rather than relying on uncertain capacity and generators.

- A proper site-specific assessment of the local roads and pedestrian safety.

- Completion of all outstanding ecological surveys, including surveys for bats and other protected species.

- Proper consideration of the effect that a development of this size would have on the existing residents and character of Piddington.

This is a huge change for a small village. My family has been part of Piddington for five generations, and I care very much about the village and the people who live here.

I have experienced flooding myself, I know the limitations of the local infrastructure, and I use the local roads as a resident. I do not believe the impact of this development has been properly addressed.

For these reasons, I strongly object to the proposed development at Site A, MOD Bicester.

Please acknowledge receipt of my objection and confirm that it has been added to the case file.

Yours faithfully,

[redacted]

[redacted]

Piddington

Bicester

[redacted]

72. [redacted]

Address: [redacted], Piddington, [redacted]
Date: 14 September 2026

Dear Sir/Madam,

I am writing to formally object to the proposed development of Site A, MOD Bicester, for Home Office accommodation for up to approximately 1,256 single adult men.

Application reference: PCU/RARE/C3105/3378843

My name is [redacted] and I live at [redacted], Piddington, [redacted]. I have lived in Piddington for approximately 45 years and therefore have extensive personal experience of the local roads, weather conditions, drainage and flooding in the village and surrounding area.

My objection is based principally on highway safety, inadequate road infrastructure, flood risk and drainage capacity.

Highway safety and the [redacted]

I regularly drive to work early in the morning, often when it is still dark. I have considerable first-hand experience of the conditions on the Thame Road and the difficulties that can arise, particularly during periods of poor visibility.

The Thame Road is notorious locally for thick fog, which is made worse by the nearby river and flood plain. At times visibility can become extremely poor, particularly during the early morning hours when I am travelling to work.

The road is also not well suited to accommodating a significant increase in traffic and pedestrian movements. There are sections with little or no verge, limited pedestrian provision and insufficient road markings to give drivers and other road users the level of guidance and protection that would be desirable on a road carrying additional traffic.

This is particularly concerning given the scale of the proposed development. The Parish Council's information records that traffic on the approach roads is already around 3,000 vehicles per day in each direction, with 85th percentile speeds of approximately 53–54 mph. It also notes that where footways exist they can be approximately one metre wide, compared with the two metres recommended by Department for Transport inclusive-design guidance.

I am therefore concerned that the existing road network is simply not appropriate for the additional traffic and pedestrian movements that a development of this scale would generate.

I am also concerned that the Transport Assessment does not provide a proper assessment of Widnell Lane, which is the direct route towards Piddington. According to the Parish Council's review, Widnell Lane has no traffic count, collision search or safety assessment within the Transport Assessment.

From my 45 years of living here, I believe that the actual conditions experienced by people using these roads should carry significant weight. A theoretical assessment cannot fully reflect the difficulties caused by darkness, fog, narrow roads, lack of verges and poor visibility.

Flooding and drainage

Flooding is another major concern for me.

Piddington and the surrounding area have experienced frequent flooding, and this is not simply a theoretical risk. I personally experienced flooding at my own home in 2008, when the flooding was sufficiently serious that I had to leave my home and move into temporary accommodation.

That experience has given me a very real understanding of how serious flooding can be for residents and how disruptive it can be to homes and the wider community.

I am therefore extremely concerned about introducing a development of this scale in an area where water and drainage are already significant issues.

The information provided by the Parish Council records that the applicant's own Flood Risk Assessment identifies approximately a quarter of the proposed site as having a "high chance" of surface-water flooding in any given year, with other areas classified as medium or low risk. It also states that the site's private drainage ditches and pipework have not been surveyed and that the drainage strategy had not been finalised when the Flood Risk Assessment was submitted.

I find this particularly concerning given my own experience of flooding in Piddington.

The proposed development would also place substantial additional demand on water and wastewater infrastructure. The applicant's utilities assessment apparently acknowledges that wastewater capacity requires confirmation, while there is no evidence that Thames Water has confirmed in writing that the network can accommodate the additional demand associated with a development of this scale.

In my view, it would be irresponsible to approve such a large development before the drainage, sewage and flood-risk implications have been properly established and demonstrated to be manageable.

Scale of the development

I am also concerned by the sheer scale of the proposal in relation to the surrounding villages and existing infrastructure.

The application proposes accommodation for up to 1,256 people. The Parish Council's evidence notes that this is more than four times the recorded population of Piddington itself.

This is not a small addition to an established community. It represents a substantial increase in the number of people who would potentially need to travel along roads and use infrastructure that was not designed for a development of this magnitude.

The concerns about the roads and flooding therefore cannot reasonably be considered in isolation from the scale of the proposal.

Inadequate information before a decision

I am also concerned that important aspects of the proposal appear not to have been fully resolved at the time of application.

The Parish Council's review identifies missing or incomplete information concerning matters including site layout, lighting, fencing, drainage, contamination and long-term infrastructure requirements. It also notes that a number of matters are proposed to be resolved after permission is granted rather than being properly assessed before a decision is made.

Given the size and nature of this proposal, I believe these matters should be properly understood before planning permission is granted.

Conclusion

I have lived in Piddington for around 45 years and know the local area and its problems very well. My concerns are not based on speculation or opposition to people themselves. They are based on my own experience of living here for decades, travelling the local roads and experiencing the consequences of flooding first-hand.

In particular, I am deeply concerned that:

* the [redacted] already presents significant safety challenges, particularly in darkness and thick fog;
* there are inadequate verges and pedestrian facilities in places;
* road markings and visibility are not sufficient for the conditions experienced locally;
* the surrounding road network is not suitable for a substantial increase in traffic and pedestrian movements;
* flooding is an established and serious local problem;
* my own home flooded in 2008 and I had to move into temporary accommodation as a result;
* the proposed site itself has identified surface-water flood risks;
* drainage infrastructure and capacity have not been sufficiently demonstrated for a development of this scale; and
* important aspects of the proposed development and infrastructure remain unresolved.

For these reasons, I respectfully ask that the application be refused.

If the decision-maker is not minded to refuse the application, I ask that no decision be made until the highway safety, flood-risk, drainage, sewage and infrastructure issues have been fully assessed using robust, site-specific evidence and all necessary mitigation has been properly identified and secured.

Please acknowledge receipt of my objection and confirm that it will be placed on the official case file.

Yours faithfully,

[redacted]

[redacted]

Piddington

[redacted]

73. [redacted] (Mrs)

Address: [redacted], Piddington, Oxon, [redacted]
Date: 13/09/26

Dear Sir/Madam,

As a long term resident of Piddington, I'm writing this email to personally object to the proposed change of use and development of Site A, MOD Bicester to provide accommodation for a large number of asylum seekers.

My objections stem from the following facts: firstly, this application is for an initial 1,256 people, with the numbers expected to rise to 3,510 after a phased introduction and a further ordnance clearance programme. This worries me because as it stands, when I first moved to the area in the early 2000s, the previous proposal for an asylum centre proposed a capped population of 750 people and after a public enquiry and an independent assessment, the proposal didn't go ahead due to the lack of care and utility infrastructure, the site isolation and other salient factors. The site is now to double or treble its capacity, (outnumbering our village population fourfold) and there has been NO material changes since 2003 to the site's suitability, its utilities, or to the dangers of the access routes.

As a driver and a cyclist I have had to assist in several incidents on the main road, the Thame Road, over the last decade, including lone vehicle crashes due to surface water, multiple vehicle incidents caused by surface contaminants and excessive speeds. For safety reasons I no longer cycle along the Thame Road, (apart from a 20 yard stretch between the Piddington lower road and the turn off for Palmer avenue towards Arncott) , as I have personally had several near misses ending up in the verge or in the ditches due to cars and vans travelling too near to me and at speeds exceeding the 50 mph limit. For anyone hoping to walk to the nearest villages or Bicester there are no footpaths or any safe means to get there and I regularly see people who don't know the area walking on the main carriageway. What I would like to see happen, prior to a decision being made, is a full transport feasibility study of the surrounding area including identifying safety measures to control heavy plant movements, planning transport links for service users and assessing the impact of the movement of people in a very unsafe and busy road environment. The Thame Road has seen in excess of 50 accidents in the last 6 years alone, two of which were fatalities.

My second objection is to the assumptions being made as to the provision of utilities by the applicant. Their assessment is that the current capacity, condition and configuration of the electrical network is "unknown" and its initial capacity has not been verified. They state their intention of using temporary and permanent generators for the energy usage on site, which will cover everything, including heating, lighting, cooking and hot water for the 1,000 + residents. This gives me grave concern as generators emit high decibel levels and fumes and for a site of this size will need to be operated continuously. What effect will this have on the mental health and well being of any residents at Site A ? As a villager I have experienced regular power outages over the last decade and these have necessitated relying on generators at the village hall for shared power when the network has been down, sometimes for days at a time.

What about the provision of water and sewerage? The applicant has not as yet sought confirmation of capacity to deal with Site A's water supply or waste water treatment and there is no on site treatment plant. The applicant's foul drainage policy is only at the provisional stage as it requires further inspection, survey and will have compliance notices to face. I'm very concerned about this as in Piddington we already have water supply issues and have regular burst mains, low water pressure and even whole days with no water supply at all. These issues are usually slow to be resolved by South West Water and I think can only get worse.

I request that no decision be made about Site A until the relevant Water authorities have formally confirmed, in writing, that the water needs of site A residents AND the local villages can logistically be met on a long term basis. Water has to be a prime consideration in all cases, especially as we

go into a long term drought period due to global warming and with the proposal for a large AI data centre near Bicester and the impact of that on the network.

For all these reasons and a host of others I would urge you to reconsider this application for change of use of Site A, MOD Bicester. This is definitely the wrong site and place for all concerned.

Your sincerely,

[redacted] (Mrs)

[redacted],

Piddington,

Oxon,

[redacted].

74. [redacted] (Miss)

Address: [redacted], Piddington, Oxon, [redacted]
Date: not stated

Dear Sir/Madam,

As a resident of Piddington and would like to state my objections to the change of use and development of Site A. I object primarily from a humanitarian viewpoint and have the following to say:

The housing of a large number of asylum seekers next to a village a quarter of its population is not proportionate, and I therefore object to it. The infrastructure and utilities base of Piddington is not well set up for even the 330 inhabitants and I know from personal experience that our village regularly has power cuts, water shortages/ outages and flooding. Not only that, but the absolute absence of basic infrastructure such as shops, public transport and social spaces (such as pubs, social clubs etc) makes this site a terrible choice for housing anyone, let alone highly vulnerable individuals. I'm worried that the lives of the 'service users' and the surrounding villages (Piddington, Blackthorn, Arncott) will be seriously affected by the extra demand placed on fragile services, not least because the added question of dealing with waste water hasn't yet been properly explored by the applicant. The idea of building a sewage treatment plant within 45 metres of the accommodation blocks is reprehensible and inhumane. I would ask that before any decisions are made that a full dialogue be commenced and assurances be sought, in writing, from the water and sewerage authorities, as to their capacity to deal with the extra demand from Site A.

Secondly, the lack of foresight concerning the welfare and safeguarding of the site's residents is very evident. No capacity assessments of the site appear to have been agreed, with the Police, Fire and Rescue, NHS integrated care, the County Council or the ambulance service. This also then begs the question of who will be addressing the mental health needs of a site of far from home, traumatised people, who will be housed very near to an active military training and firing range and may well be suffering the effects of PTSD? As someone who has a PTSD diagnosis myself, I know how detrimental it can be to not receive the proper support for this debilitating condition. I would ask that before any decisions are made this serious issue is researched and agreements are put in place with all the relevant bodies as a matter of urgency.

Thirdly, the condition of the site A environment is of great concern. The Home Office's Equality Impact Assessment admits that the site and rooms aren't adapted for all the accessibility needs of all service users. Add to this the potential for unexploded ordnance and asbestos contamination on site, potential flooding, proposed continuous use of noisy and noxious diesel generators and lack of sustainable fire hydrants and exits and the problems with the sustainability of the site are all too obvious. Before any decisions are made there needs to be full and accurate site surveys and accurate costings for each and every safety aspect outlined above.

For the reasons outlined above and for those raised by the members of Piddington village I urge the Secretary of State to refuse this application.

Yours sincerely,

[redacted] (Miss)

[redacted],

Piddington,

Oxon

[redacted].

75. [redacted]

Address: [redacted], Piddington, nr. Bicester, [redacted]
Date: 13/08/2026

[redacted]

[redacted]

Piddington

nr. Bicester

[redacted]

13/08/2026

application reference PCU/RARE/C3105/3378843

To whom it may concern this is my statement of why I believe this planning application is totally unsustainable.

I have two main reasons for objecting to this application.

1) the complete lack of ANY utilities on the site -ie no water, drainage, sewage, electricity or any existing form of housing, and the cost (to the tax payers) to install this will be enormous, and negates the supposed savings of the already built houses that could be used.

2)

My other very large concern is the ecology of the site. In short there has been found an enormous number of protected species on the site which wold be lost, and no biodiversity assessment seems to have been produced, or a heritage assessment despite this being a standard requirement for such a development.

Regards

[redacted]

76. [redacted]

Address: [redacted], [redacted], Oakley, [redacted]
Date: 13 September 2026

Dear Sir/Madam,

Re: Application Reference PCU/RARE/C3105/3378843

Objection to the proposed use of Site A, MOD Bicester, for asylum accommodation

I am writing to formally object to the proposed development of Site A, MOD Bicester, for accommodation of up to 1,256 single adult males.

My objection is based on planning and infrastructure concerns regarding the suitability of the site, the adequacy of the supporting evidence, and the use of the urgent Crown development process for a proposal that appears intended to operate for many years. The scale and nature of the proposal require a far more comprehensive assessment than has been provided to date.

My principal concerns are as follows:

1. Inadequate assessment of infrastructure capacity

The application does not appear to provide confirmation that local water, wastewater and utility infrastructure can support a development of this scale. The applicant's own documents acknowledge that wastewater capacity requires confirmation and that the electricity network capacity serving the site has not been verified. Reliance on assumptions or future investigations is not, in my view, sufficient justification for approving a development intended to accommodate over 1,200 residents.

2. Highway safety and accessibility concerns

The location is poorly served by pedestrian infrastructure and public transport. Existing roads are rural in character, with limited footways and relatively high vehicle speeds. Previous planning assessments for accommodation proposals in this area identified concerns relating to isolation and pedestrian safety. I am concerned that the transport evidence does not adequately demonstrate that the surrounding network can safely accommodate the increased movements associated with a facility of this size.

3. Flooding, drainage and environmental risks

The applicant's own Flood Risk Assessment identifies areas of the site that are susceptible to surface water flooding, while long-term drainage arrangements remain unresolved. Furthermore, a number of ecological surveys are still outstanding and the ecological assessment itself acknowledges that it is not comprehensive. It is difficult to understand how a fully informed planning decision can be made before these matters have been properly assessed.

4. Ground contamination and unexploded ordnance risks

Site A has a history as a former military ordnance depot. The documentation indicates the potential presence of contamination, asbestos-containing materials and unexploded ordnance risks, yet only preliminary assessments appear to have been completed. I do not believe permission should be granted before comprehensive site investigations are undertaken and the findings made publicly available.

5. Missing information and unresolved matters

A significant number of important details appear to be deferred until after any permission is granted, including elements of drainage, lighting, contamination remediation and power infrastructure. Key plans and supporting information are missing or incomplete. Given the scale of the proposal, these matters should be resolved before a decision is made rather than left to future conditions.

6. Scale and sustainability of the proposal

The proposed capacity of 1,256 residents represents a very substantial development in a rural location. I am not persuaded that sufficient evidence has been provided to demonstrate that this site is a sustainable location for a facility of this magnitude, particularly when there remain unresolved questions regarding infrastructure, transport, environmental impacts and community services.

7. Lack of meaningful consultation and scrutiny

The proposal is being advanced through an urgent Crown development procedure despite being described as part of a long-term accommodation solution. The limited consultation opportunity available to local communities raises concerns that important planning issues have not been subjected to the level of scrutiny normally expected for a development of this significance. In addition, there is some confusion as to whether the proposed number is c1,200, or as many as 3,500. It is not acceptable that precise numbers are not known (or published) at this stage.

8. Historical objections

A similar accommodation proposal for this area was previously found unsustainable following a public inquiry, with concerns raised regarding isolation, community cohesion, local services and pedestrian safety. The current proposal is significantly larger, and I do not believe the applicant has demonstrated that the concerns identified previously have been adequately resolved. I am also concerned that no published alternatives' assessment has been provided demonstrating why Site A represents the most suitable and proportionate solution when compared with smaller-scale or dispersed alternatives.

For these reasons, I respectfully request that the application be refused. At a minimum, no decision should be made until all outstanding surveys, infrastructure capacity confirmations, environmental assessments and site investigations have been completed and independently reviewed.

Please acknowledge receipt of this representation and keep me informed of any future developments relating to this application.

Yours faithfully,

[redacted]

[redacted], [redacted], Oakley, [redacted]

13/09/2026

cc: Piddington Parish Council, Greg Smith MP, Calum Miller MP

77. [redacted]

Address: [redacted], [redacted], Piddington, Oxfordshire, [redacted]
Date: 14 September 2026

[redacted]

[redacted]

[redacted], Piddington

Oxfordshire [redacted]

[redacted]

14 September 2026

Piddington Parish Council

By email: joe.marshall@piddingtonpc.org

Dear Piddington Parish Council Members,

Re: Site A, MOD Bicester — Application reference PCU/RARE/C3105/3378843 — Formal Objection

We are writing to register our objection to the above application and to ask the Parish Council to reflect

these concerns in the representation it makes to the decision-maker, and in its summary of local opinion.

We are also submitting this objection directly to the Crown Development Casework Unit at MHCLG,

quoting the reference above.

Our objection is deliberately focused. The application does not demonstrate that the essential

infrastructure and local services needed to support up to 1,256 residents exist, have the capacity, or are

funded — and on the applicant's own documents these questions are repeatedly left open. We recognise

the pressure on the asylum system and support the aim of ending the use of hotels; our concern is not the

principle of accommodating people seeking asylum, but that this particular site has not been shown to be

serviceable at this scale. Our professional background is in engineering and the delivery of critical services,

and we know the difference between a verified capacity assessment and an intention to confirm capacity

later. This application rests on the latter.

Essential infrastructure is deferred, not demonstrated

The application is being progressed under the urgent Crown development procedure, under which the key

infrastructure and service providers — Thames Water, the electricity network operator, the NHS

Integrated Care Board, Thames Valley Police, Oxfordshire Fire and Rescue, South Central Ambulance

Service, and the county council as highway and flood authority — are not mandatory consultees. At least

nine matters, including the long-term power supply, the contamination investigation and the long-term

foul and surface-water drainage solutions, are left to be resolved after any permission rather than

assessed now. The effect is that the very questions determining whether this site can function may never

be tested before the decision is taken. We ask that permission be refused, or at least deferred, until the

confirmations set out below are on the case file.

Water, foul drainage and sewage

No written confirmation from Thames Water has been provided that the network can accept the

additional load of a settlement of this size. The applicant's own utilities assessment states only that

headroom at Bicester wastewater treatment works "may exist but requires confirmation", and the foul

drainage strategy is expressly provisional, pending further survey. There is no on-site treatment plant.

We have personal experience that the water supply in Piddington is low pressured, and at times is unable

to maintain sufficient static pressure. We have had to install significant storage and pumping within our

own house to manage this lack of pressure, and know the system cannot support further demands.

We ask that no permission be granted until Thames Water has confirmed, in writing, that both clean-

water supply and foul/sewage capacity are available for this development.

Electricity and gas

The applicant's own assessment states that the condition and capacity of the electrical network are

"currently unknown" and that the capacity of the primary intake "has not been verified". In the absence

of a confirmed grid connection, the applicant proposes to rely on temporary and permanent generators to

meet an estimated maximum demand of around 2.16 MVA. There is no gas supply, so heating, hot water

and cooking for more than a thousand people would depend entirely on this unconfirmed electricity

supply. The only network correspondence in the pack is an automated asset-protection reply that

expressly does not constitute any agreement. Powering a community of this size on an unverified supply

and standby generators is not a demonstrated solution. We ask for evidence of a confirmed, adequate

grid connection before any decision is made, and acknowledgement that generators (whether temporary

or permanent) would not be an acceptable solution for powering a residential settlement.

Surface water and flood risk

The applicant's own Flood Risk Assessment records that around a quarter of the site has a "high chance"

of surface-water flooding in any given year. The drainage strategy needed to manage that risk had not

been finalised when the assessment was submitted, and the standard modelling relied upon does not

account for the site's own private ditches and pipework, whose condition has not been surveyed.

Our own experience is that the clay soil in the area causes high run off, and our own lane floods multiple

times a year during high rain periods.

We ask that a finalised surface-water drainage strategy, agreed with the Environment Agency and the

county council as lead local flood authority, be required before any decision.

Access, highways and pedestrian safety

The site is served by the Thame Road and Widnell Lane — rural roads with, in places, only a one-metre verge or

footway against the two-metre minimum in the Department for Transport guidance the applicant says it

has followed. Recorded traffic averages around 3,000 vehicles a day in each direction at 85th-percentile

speeds of 53–54 mph. Yet significant parts of the baseline traffic and speed data are taken from a road in

Essex rather than surveyed locally; heavy goods vehicles were set to zero in three of the four junction

scenarios modelled; and Widnell Lane — the direct route to our village — has no traffic count, no collision

search and no safety assessment anywhere in the Transport Assessment. A child died in a recorded

collision on this same corridor near Blackthorn in 2024 (BBC News, April 2024). Safe pedestrian and

vehicular access is basic infrastructure, and it has not been properly assessed here. We ask for a site-

specific transport and pedestrian safety assessment, expressly including Widnell Lane, before any

decision.

Capacity of local services

Up to 1,256 residents — with the site's own unexploded ordnance assessment scoping its work around

3,510 service users — would be placed beside villages whose recorded populations are a small fraction of

that; Piddington itself has 304 residents. No site-specific capacity assessment appears to have been

agreed with the NHS Integrated Care Board, Thames Valley Police, Oxfordshire Fire and Rescue Service,

South Central Ambulance Service, or the county council. The Home Office describes the site as "largely

self-sufficient", but the application does not set out which services will be provided on site, which will fall

on already-stretched local provision, and who will fund them. We ask that site-specific capacity assessments be agreed, and the funding confirmed, with each of those bodies before any decision.

Conclusion

For these reasons we object to the application. We ask that planning permission be refused, or at the very least that no decision be taken, until the following have been provided and placed on the official case file:

• written confirmation from Thames Water of clean-water and foul/sewage capacity;

• evidence of a confirmed, adequate electricity grid connection;

• a finalised surface-water drainage strategy agreed with the Environment Agency and lead local flood authority;

• a site-specific transport and pedestrian safety assessment covering the [redacted] and Widnell Lane;

• site-specific, funded service-capacity assessments agreed with the NHS ICB, Thames Valley Police, Oxfordshire Fire and Rescue, South Central Ambulance Service and Oxfordshire County Council.

We support ending the use of asylum hotels, but a decision of this scale should be built on demonstrated infrastructure and services, not on assurances to confirm them later. We would be grateful for acknowledgement that this representation has been received and placed on the official case file, and we ask to be kept informed of the next steps.

Yours faithfully,

[redacted]

[redacted], [redacted], Piddington, Oxfordshire

78. [redacted]

Address: [redacted], [redacted], Piddington, [redacted]
Date: 13 September 2026

Dear Joe / Piddington Parish Council,

I am writing as a resident of Piddington to formally record my objection to the proposed Home Office asylum accommodation at Site A, MOD Bicester (application reference PCU/RARE/C3105/3378843).

I have lived in Piddington for approximately six years and my home is around 1.3 miles from the entrance to Site A.

Highway and pedestrian safety

My principal concern regarding the surrounding road network is highway safety.

I use the Thame Road and Widnell Lane at least twice every working day as part of my commute and therefore have regular first-hand experience of these roads. The Thame Road is, in my experience, a dangerous road. Cars and motorbikes frequently travel at high speeds in both directions, and there are several tight corners and sections where visibility is restricted.

I have witnessed occasions where pedestrians or cyclists have caused approaching vehicles to brake sharply or swerve to avoid them.

My concern is therefore about the additional traffic and vehicle movements that would be generated by a development of this scale. The proposed accommodation could house up to 1,256 people, in addition to staff, coaches, minibuses and delivery vehicles.

I am concerned that the Transport Assessment does not adequately assess the particular risks associated with the road network serving Piddington. In particular, Widnell Lane, which provides the direct route towards Piddington, does not appear to have been subject to a traffic count, collision search or specific road safety assessment.

There are also existing narrow footways and relatively high vehicle speeds on the surrounding roads. I do not believe that the application has adequately demonstrated that the additional traffic associated with the development can be accommodated without an unacceptable impact on highway and pedestrian safety.

Impact on Piddington and its community

I am also concerned about the effect that a development of this scale would have on the character and day-to-day environment of Piddington.

I have two young daughters who currently walk and cycle through the village to visit friends. One of the things that makes this possible is that Piddington is a small village where there is a strong sense of familiarity and community.

The proposed development would introduce up to 1,256 additional residents immediately outside the village, alongside associated staff and visitors. This represents a very substantial change in the number of people regularly using the village and its surrounding roads and facilities.

My concern is not about the background or status of the people who may be accommodated at the site. It is about the scale of the change to the local environment and the consequences for families who currently allow their children to move around the village relatively independently.

As a parent, I would be significantly less comfortable with my daughters walking through the village on their own or even together if the number of people unfamiliar to the existing community increased to this extent. I would expect to have to accompany them for activities that they can currently undertake independently. That would represent a meaningful change to our family’s use and enjoyment of the village.

I appreciate that this is a personal concern, but I believe it is relevant when considering the impact of a development of this exceptional scale on an existing small rural community. I would therefore

expect the implications for community cohesion, safeguarding and the use of local facilities to have been properly assessed before a decision is made.

Flood risk and drainage

I am also concerned about flood risk and drainage.

The area around Piddington is prone to flooding. The application identifies approximately a quarter of the proposed site as having a high chance of surface-water flooding in any given year.

I am particularly concerned that the drainage arrangements do not appear to have been fully established. The site's existing private drainage ditches and pipework have not apparently been fully surveyed, while the drainage strategy remains subject to further work.

Given the scale of the proposed development, I do not believe that such fundamental issues should remain unresolved when the decision is made.

Infrastructure capacity

The proposed development would introduce up to 1,256 additional residents to the area. I am concerned that the necessary infrastructure capacity has not been demonstrated.

In particular, the proposed wastewater arrangements appear to depend upon confirmation that sufficient capacity exists within the local network. There does not appear to be confirmation from Thames Water that the network can accommodate the additional demand.

The capacity of the electricity infrastructure serving the site also appears not to have been fully established, with generators proposed to meet the anticipated demand.

For a development of this scale, I would expect the necessary infrastructure requirements to have been properly established before a decision is taken.

Scale and suitability

I am concerned about the sheer scale of the proposed development in this location.

Accommodation for up to 1,256 people represents a very substantial development in the context of Piddington and the surrounding villages. Piddington itself has a population of only around 300 people.

The proposal would therefore have a significant impact on the surrounding rural area and on the roads and infrastructure serving the local communities.

In my view, the greater the scale of a development, the greater the need for the applicant to demonstrate convincingly that the site is suitable and that the resulting impacts can be safely and sustainably accommodated. I do not believe that this has been demonstrated in this case.

Adequacy of the application

I am also concerned that a number of important aspects of the proposal have not been sufficiently resolved within the application.

In particular, detailed information appears to be lacking in relation to matters including the final site layout, external lighting, boundary and security arrangements and drainage.

I do not consider it appropriate for fundamental matters that could materially affect the impact of a development of this scale on its neighbours and the surrounding area to remain unresolved until after permission has been granted.

Conclusion

For the reasons set out above, I object to application PCU/RARE/C3105/3378843.

My objection is based on the suitability of the proposed site and the likely planning impacts of the development, particularly:

• highway and pedestrian safety;

• the impact of additional traffic on the [redacted] and Widnell Lane;

• the impact of such a substantial increase in population on Piddington and its existing community;

• flood risk and drainage;

• the adequacy of local infrastructure and utilities;

• the exceptional scale of the development in the context of the surrounding villages; and

• the extent to which important aspects of the proposal remain unresolved.

I would be grateful if you could record my objection as part of the Parish Council's consultation and include my concerns in the Council's representation regarding the application.

Please confirm receipt of my representation.

Yours sincerely,

[redacted]

[redacted], [redacted], Piddington, [redacted]

13 September 2026

79. [redacted]

Address: [redacted], [redacted], Piddington, [redacted]
Date: not stated

[redacted]
[redacted]
[redacted]
Piddington
[redacted]

Dear Joe,

I am writing to object to the planning application PCU/RARE/C3105/3378843.

As a resident of Piddington village I am extremely frustrated by the lack of consultation with residents, or even Cherwell District Council, about the proposal. The procedure carries no statutory requirement for public consultation, no guaranteed minimum period for representations, and no requirement to notify neighbouring residents directly. As someone who will be directly impacted by this proposal this feels undemocratic and I urge you to withhold a decision until residents have been engaged in meaningful consultation.

The application records the proposed use class as C2A - Secure Residential Institutions. This is the same class used for prisons and detention centres. However, this contradicts the Home Office's repeated communication that the site residents will be "free to come and go" with a "sign in, sign out" policy. Surely this is something that residents should be consulted on and be given the opportunity to work with the applicant on a process that suits the needs of both parties. As a mother of small children, clear communication on the security of the site is important to me personally in deciding how and when to use Widnell park. Please do not make a decision until the confusion over this classification has been resolved.

Many thanks for your consideration and I look forward to your response.

[redacted]

80. [redacted]

Address: [redacted], Piddington, Bicester, [redacted]
Date: 13th September 2026

For the Attention of Secretary of State

I am writing as a member of the public to object to planning application PCU/RARE/C3105/3378843 (proposed 1,256-person asylum accommodation centre at Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, [redacted].)

Having studied the documents submitted with the application I would first of all bring attention to the application form section 19 which states that the use is for C2A which is secure institutions similar to prisons and secure hospitals, however the Home Office has stated that this is not a secure institution as the residents are free to come and go day and night, 7 days a week and therefore the application should NOT be classified under the class stated as this is not a true reflection of the proposal.

A smaller accommodation centre was proposed early in 2000, this scheme was abandoned after inspectors found the location isolated, strain on services, road safety (very few pavements on main or surrounding roads leading into the town of Bicester). The national Audit Office found that a comparable accommodation programme in early 2000 was uneconomic and did not represent value for money.

The proposal is for a capacity to house 1256 single adult males, I am a resident of Piddington which is the nearest settlement and borders the proposed facility, the current population of which is 304 residents, this proposal is four times the capacity of the village and I have serious concerns of being overwhelmed by this facility, there are no facilities within the village, no shop, no pub just a church and village hall, we also don't have any street lighting after mid night and no pavements to walk on. It is extremely concerning that this facility is proposed in such a rural location with no amenities close by.

Independent evidence, including High Court findings concerning a comparable site (RAF Wethersfield), has found that large-scale, isolated institutional accommodation of this kind carries a foreseeable risk of mental health deterioration among occupants, describing the Home Office's failure to assess the equalities impact of its own allocation policy as "a most serious and inexplicable omission".

Having said that the facility is to house 1256, single adult male above, section 1 (executive summary) of the PRELIMINARY UXO RISK ASSESSMENT – SITE 015 states a service capacity of 3510 users, this is nearly 3 times the capacity stated elsewhere, which would suggest that future planning may be much larger. The risk assessment is also a primary document based on a desk based assessment, no actual intrusive surveys seem to have been carried out and there is a risk that unexploded ordnance and contamination may be present.

There are so many unknown entities within the proposal such as flooding and drainage concerns, wastewater and electricity concerns, with no solution to a permanent solution, the applicants assessment for the electrical supply even states that the current capacity is unknown and that generators would need to be relied on to meet the demand, this would, of course, mean diesel would be required to power these adding to pollution and noise creation.

The ecology survey was undertaken between 26th March - 10th April 2026 (item 2.3.1 Habitats in ecology report), this is inside/outside of the recommended time scale of April to September, so can not be relied on as a comprehensive survey.

If this application was to follow normal planning procedures, for say, a 300 home housing estate (x4 occupants/property =1200 people), this would never be approved for construction based on the information received.

In view of just a few notes above and not having time to consume all of the documents submitted due to the short representation period allowing insufficient time, I do not consider the applicant to demonstrate that the proposed facility is a suitable location for the area, taken together with the

many presumed/preliminary documents submitted in the application, I would request that planning permission is refused.

Yours faithfully

[redacted]

[redacted]

Piddington

Bicester

[redacted]

13th September 2026

81. [redacted]

Address: [redacted], [redacted], Piddington, Bicester, [redacted]

Date: 12 September 2026

Mr [redacted]

[redacted]

[redacted]

Piddington, Bicester [redacted]

12th September 2026

Dear Piddington Parish Council Members

Re: Site A, MOD Bicester Application Reference - PCU/RARE/C3105/3378843 – Formal Objection

I am writing to you personally in the hope that you might make representation for my deep concerns over the current intended use of the above site adjacent to our village to house 1,250 single adult men in a "open" location, which I believe to be totally unsuitable and without adequate existing infrastructure that will have a detrimental impact on my home, life and those of my neighbours in Piddington and the surrounding villages and communities.

By way of background, I moved into the village in August 2011 following a period of 8 years whilst I fought and was treated for cancer and needed a change in my life to something less stressful, Piddington has been that perfect tonic, until now.

I'd like to set out the reasons for my objections below for your consideration.

Due Process

When the Home Office announced the intention to use Site A as an asylum centre on 25th June 2026, I was surprised that neither you, our Parish Council, nor Cherwell District Council were consulted. This came as a complete surprise to many and created a great deal of unhelpful speculation, rumour, stress and anxiety. All of which I sought to get away from when moving to Piddington.

I'm aware that a previous similar proposal was pursued in early 2000, rejected in 2003 and ultimately abandoned in 2005. What has changed at this site since then? Why has this history not been considered?

Having taken the time to read the adopted policies in the Cherwell Local Plan 2011-2031, including Policy PSD1 (presumption in favour of sustainable development), Policy SLE4 (facilitating safe and suitable access to all users, Policy INF1 (infrastructure to support development) and the plan's environmental and heritage protection policies, I am at a loss to see how the actions of the Home Office are in any way congruent. It feels like the whole process needs to be slowed down, assessed properly and given wider due consideration of both the above policies and, indeed many other aspects, I'll comment on below.

My personal experience of Due Process and its importance, harp back to when I was a director and shareholder of a horticultural business called Blooms of Bressingham. I acquired the site called Bicester Garden Centre set back from the A41 in Bicester, back in 2000. I recall the detailed

planning application process I undertook, the time, cost and careful consultations that I undertook on the following areas:

1. A detailed traffic assessment of the site, its impact on the local community, surrounding businesses and what we could do to alleviate this.

2. An assessment of the flood risks to both our site, our neighbours and the environment. The outcome of this added a lot of money to the establishment of adequate containment waterways, flood protection and re-introduction of flora and fauna to stimulate the growth of wider vegetation and wildlife.

3. Considerable investment in enabling our own utilities infrastructure to reduce the impact on surrounding businesses and communities for electricity, mains water, wastewater, fouls, emissions, light pollution, noise impact and general nuisance. These were all considerable and timely investments, but the right thing to do for the long term.

4. We carried out detailed ecological and biodiversity studies on the site and added suitable housing for wildlife and ring-fenced areas where we felt it important to protect the environment.

5. We diligently considered all the guidelines, any conflicts local and national planning policies and adopted compromises in the design and our approach. My intention as someone who lived locally, was to remain proud and responsible for what was created.

The outcome was a successful and thriving addition to the local environment that still trades today, albeit as a Blue Diamond garden centre, but something I remain proud of. All within the prescribed framework and national planning policy.

My question is why has the Home Office deemed it fit to ignore so much of the due process that I followed above? Why are there inconsistencies between what is required on us as citizens and individuals and the approach of government? How does this reassure communities of fair representation from those we elect as part of the democratic process. How will the Home Office treat the reports commissioned so far on the suitability (or unsuitability) of Site A?

Highways, access and pedestrian safety

As a keen hiker, I walk around both Piddington and the local area often, sometimes daily. I have occasionally found myself walking along the verge of the Thame Road, the main access and egress from Site A. There is no pedestrians' walkway, pavement or even a track on either side of this busy road in either direction and I have often seen vehicles passing dangerously close to the odd pedestrian taking the risk of walking along uneven, overgrown verges, with hidden drains, kerb edges and other vegetation. I recall once having a "near miss" when a lorry came close to hitting me as I walked along this road.

One individual's experience is dangerous enough, but with the risk of almost 1,300 potentially young men, bored and seeking to discover the local area, this can only be a recipe for a potential accident! Has this risk been assessed and what is the containment plan?

By simply offering infrequent transport to ferry these men to and from Bicester town centre, which is almost 5 miles away, this is an inadequate solution. Inevitably there will be some men that choose to try and walk, which will become dangerous for them and road users, especially as there is inadequate lighting along the carriageway. British Summer Time ends in October, and the light

levels will further deteriorate leading to further dangers. How is the impending winters hours being planned for in terms of safety for all concerned.

There is already considerable traffic coming from HMP Bullingdon, the nearby MOD sports pitches and the adjacent traveller's site along Widnell Lane, only 150m away. This will add further risk to all parties.

Finally, as a former dog owner, I very much feel that our local park at Jubilee Nature Reserve, which is right next to Site A, and a place often used by dog walkers as a safe area, will potentially become a place that asylum seekers will come to loiter at and potentially cause noise, generate litter, and bring a risk of conflict with local residents, especially our women, who are feeling extremely vulnerable.

Surely a proper traffic assessment survey should be undertaken, risks properly assessed and a suitable plan to invest appropriately be adopted? This might take time but surely is the correct approach and one that was demanded of me as a businessman.

Adequate and suitable infrastructure

As I understand it, there are currently no adequate provisions on Site A to accommodate and safely house these young men. The site has never been used for accommodation, so has no suitable infrastructure at all.

Electricity – Although there seems to be high level High Voltage pylons running across the site, there are currently very little adequate power provisions to cater for the needs of 1,250 men, for lighting, heating, washing facilities, on site catering, security, safety and entertainment. I have been told that there is a plan to bring diesel powered generators onto site to provide "temporary" power. Having had to deploy these on a short term myself, I'm aware that they are incredibly expensive to operate, generate undesirable pollution to the environment, are very noisy and often prone to breaking down if run for long sustained period of time, not to mentioned highly suspectable to vandalism or fuel theft.

As a local resident, I've experienced several power cuts in the village over the years so am aware that the current provision of electrical supply is under severe pressure. Having checked the local plan with SSEN, there are no current intentions or budget to improve the infrastructure, so how is Site A going to be provided for in a sustainable, viable and economic manner?

Gas – There is no mains natural gas pipeline anywhere on this side of Bicester. Our village already relies on using electricity, heating oil, kerosene and logs for heating and hot water. Without natural gas, Site A will have to seek alternative sources of energy to provide adequate heating and cooking provisions. Is this suitable for such large numbers on a sustained basis? What will the associated costs be?

Water, drainage and sewerage capacity – As we come to the end of this summer, one of the driest on record, we're still under a hosepipe ban by Thames Water. We've had several days, when water supply has been on extremely low pressure or sometimes non-existent. With a population of just over 300, the water supply is simply inadequate. So how will this be able to provide for a further 1,300 people, along with support staff and security?

I'm not aware that Thames Water have any current plans for improvements to either water storage or additional supply infrastructure in the area, so how will the Home Office make provision for this without a direct impact on our village? What are the costs of this over the short to medium term?

I'm also led to believe there are no current fouls drainage on site, so the toilets / washing facilities and other wastewater will need to be collected, pumped, and manually removed from site. Having installed sewerage treatment plants and septic tanks on garden centres, I'm fully aware of the huge investment costs and planning requirements from the Environmental Agency – have these licences been obtained? What provision has been made to contain any spills risks so that the local area, wildlife and water course ways are not impacted?

Flood Risks – In recent years, with the growing incidents of flash floods in our area, I've personally witnessed occasions when our village roads, the roads out to Ludgershall and, indeed the Thame Road have been impassable, especially along Widnell Lane and [redacted], both of which were flooded and closed for several days. The local drain system became so overwhelmed during 2025 that my neighbour experienced flooding to his property. There is no doubt that some of this negative impact has been caused by the overuse of the local flood network and development of local housing and warehousing with adequate provision.

I'm aware that the Environment Agency consider the local area as "high risk" and, to my knowledge, no local impact study has been commissioned to Site A. Why not? This will be a risk to not only the inhabitants but to us also as immediate neighbours.

Finally, with the above comes the risk of disturbing areas of known asbestos and spent munitions chemicals, which we understand are spread around the site. These could find their way into the local waterways if they are not dealt with safely and in a measured manner. How is this being handled?

Welfare and safeguarding of Site A occupants

Without doubt, since the news was announced, there has been a great deal of press coverage, social media and political vitriol. It has created a great deal of worry, anxiety and stress. All of which I chose to come to Piddington to get away from.

I can only imagine these young men will face some intimidation from antagonists, many of whom will come to our area to seek trouble and create tension. These will be worrying times.

1. What provision has there been for adequate policing resources? There is no police station in Bicester, so local support will be limited without providing facilities. Have these been considered?

2. How are Thames Valley Police being supported with this plan. What additional resource will there be in Bicester town centre, when the bus transports potentially 1,300 young men in and out of town from Site A?

3. What additional support / resource will be provided for other services, such as South Central Ambulance Services, Oxfordshire Fire & Rescue Services and the NHS Integrated Care Board. All of these services will highly likely experience additional demands on already stretched resources.

4. What provisions have been made on local GP Surgeries to cater for the medical needs and safeguarding of these young men, some of whom have arrived from war torn countries, so may have complex mental health needs. I'm all too aware that my local GP Surgery at Brill can take up to 6 weeks to provide me with an appointment, so how will they cope with the addition of 1,300 potential patients.

I'm also extremely worried about the potential cultural clashes between both the asylum seekers and the occupants of the existing Traveller's site on Widnell Lane, right next door. Has an Equality Impact Assessment been completed? What risks does this highlight?

I've read reports of a similar situation at a similar site in RAF Wethersfield found that large-scale, isolated sites with so many young men together with limited facilities can carry all sorts of mental health issues, tensions and the risk of deterioration and far worse ramification – these could well spill over into our community and present a real risk to us, especially our women.

Does this truly represent value for money?

Whilst I recognise there is a great deal of media driven public and political pressure to "remove asylum seekers from hotels" to save on money – has Site A been properly assessed? Where is the evidence and options appraisal and can it be published please?

1. With the issues around the infrastructure, meaning a considerable investment is needed to prepare adequately to accommodate such high numbers, what will the financial cost of this be and how does it compare with other sites being considered?

2. The costs, already being committed to clearing a site that has no accommodation, nor has it ever had any dwellings as it was never used for such a purpose, must surely represent poor value for money?

3. What time span are these costs being estimated over? My understanding is that the Home Office is operating under "Urgent Crown Development" measures to fast track the process. Under Class Q planning guidelines, this "temporary" measure can only be used for a period of 12 months. What happens when it is formally assessed under normal planning application processes? What happens if the change of use to Site A is deemed unsuitable / unlawful? Will this not represent a waste of taxpayers' money?

4. Will the government offer to have this plan be scrutinised by a Parliamentary Cross Party Committee to determine due process on the spending and associated value?

Summary

Personally, I do not have an issue with the sensible, measured and considered accommodation of asylum seekers on Site A, if it has been adequately planned, prepared, costed and the risks of safety properly assessed on our local community. The current process has not considered any of this adequately. To run "rough-shod" over our community and to clearly ignore Planning law and the National Framework seems to flout process, which does little to install confidence in the public of equality and fairness, so I fully and wholeheartedly wish to register my objection.

Yours faithfully

Mr [redacted]

82. Resident of [redacted] (name not stated in submission)

Address: [redacted], [redacted]
Date: 6 September 2026

FORMAL PLANNING REPRESENTATION

[redacted], [redacted]

Urgent Crown Development - MOD Bicester Site A

MHCLG reference PCU/RARE/C3105/3378843

Cherwell reference 26/01833/CROWN

Applicant Home Office

Application site MOD Bicester Site A, Bicester Garrison, Launton Road, Oxfordshire, [redacted]

Affected receptor [redacted], [redacted] and associated residential curtilage, garden, amenity and land

Submission Main Planning Representation with Technical Appendix - revised to incorporate additional

procedural, lighting, UXO and highway points

Core submission: [redacted] is the nearest identified residential receptor. The published material

leaves receptor-specific and design matters unresolved, including operational noise, construction dust,

drainage/outfalls, wastewater infrastructure, contamination pathways, lighting and the interaction of

those matters with the EIA screening judgement.

Prepared 6 September 2026. This is a planning representation and technical critique, not legal or engineering advice.

MOD Bicester Site A - [redacted] [redacted] Page 2

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Representation period: The official MHCLG/GOV.UK page now states that the representation period

commences on 7 September 2026 and closes on 17 September 2026. Representations should be emailed

to Crowncasework@communities.gov.uk by the close of that period.

PART I - MAIN PLANNING REPRESENTATION

1. Introduction and requested outcome

I make this formal representation in respect of the Urgent Crown Development application for MOD Bicester Site A. It

concerns the effect of the proposed development on [redacted], [redacted], its residential curtilage, garden,

external amenity and associated land.

The applicant identifies [redacted] as the nearest residential receptor, approximately 296 metres north of the site.

The proposal is for a ten-year temporary use and includes accommodation for up to 1,256 service users, staff and

welfare facilities, transport and parking, security infrastructure, generators, drainage and wastewater infrastructure.

The central submission is that the Secretary of State does not yet have sufficiently complete receptor-specific evidence

to conclude that the proposal will avoid unacceptable effects on [redacted].

Requested outcome: refuse unless the identified evidential gaps are satisfactorily resolved; alternatively

impose robust pre-commencement, pre-installation and pre-occupation conditions with monitoring and

corrective-action mechanisms.

2. Planning framework and EIA screening

The Urgent Crown Development procedure expedites determination but does not remove the requirement to decide

the application on its planning merits. The Urgent Crown Development Order makes special provision for EIA

development, including a mandatory 30-day publicity/consultation period. For non-EIA urgent Crown development, the

statutory procedure is materially more flexible.

The Secretary of State has issued an EIA screening Direction that a full EIA is not required. This representation does

not treat that Direction as conclusive of the underlying planning impacts. The scale of unresolved matters identified in

the applicant's own documents - including receptor-specific operational noise, drainage routes and levels,

groundwater, outfalls, wastewater design and contamination pathways - is relevant to whether the likely environmental

effects have been characterised with sufficient certainty.

Accordingly, the Secretary of State is requested to reconsider whether the screening conclusion remains

robust in light of the combined evidential gaps, or at minimum to require equivalent detailed

environmental information before determination.

This point is not that every unresolved design detail automatically requires EIA. Rather, where multiple unresolved

pathways concern the nearest dwelling and the lowest/northern part of the site, the decision-maker should be satisfied

that the screening judgement was based on an adequately defined project and sufficiently reliable mitigation

assumptions.

3. [redacted] as the nearest residential receptor

The applicant's identification of [redacted] as the nearest residential receptor establishes that the property is not a

speculative or remote concern. The technical package should therefore demonstrate the predicted conditions at the

dwelling and its land, and the enforceable controls that will maintain acceptable conditions throughout construction and

operation.

4. Noise and external residential amenity

2026

The submitted Noise Impact Assessment appears to base its road-noise assessment on the B1104, which is in Essex,

not Oxfordshire. The relevant local road for MOD Bicester Site A and [redacted] is the Thame Road. This geographical

error calls into question the local applicability of the road-noise assessment and should be corrected by a

receptor-specific assessment using the [redacted] and conditions representative of [redacted].

The assessment does not provide a clear receptor-specific prediction of noise generated by the proposed

development at [redacted]. Operational sources should include generators and standby testing, staff/service-user

activity, buses, minibuses, taxis, deliveries, security operations, waste collection, welfare/recreational uses, alarms,

fixed plant and wastewater treatment equipment. Night-time intermittent maximum events require consideration

alongside average LAeq values.

The report recognises external amenity and refers to an ideal 50-55 dB LAeq,16hr range. [redacted]'s garden,

curtilage and outdoor residential amenity should therefore be explicitly assessed.

5. Air quality and construction dust

The Air Quality Screening Technical Note screens out detailed operational vehicle-emission modelling and states that

no sensitive receptors were selected because relevant traffic thresholds were not met. That is a screening conclusion,

not a receptor-specific prediction for [redacted].

For construction dust, the note refers to a normal screening distance of 250 metres from the site boundary for human

receptors. [redacted] is stated elsewhere in the application to be about 296 metres away, close to that distance and

the nearest named dwelling. The construction strategy should expressly address prevailing wind, demolition,

earthworks, trackout, dry-weather dust, particulate matter where appropriate, generator emissions and deposition on

the property and land.

6. External lighting and rural amenity

The proposal includes security infrastructure and a continuously occupied site. Such a use is likely to require

operational, access and security lighting. [redacted] is a rural residential receptor and the effect of new lighting on

its night-time amenity should be assessed expressly.

A lighting strategy should identify luminaire positions and heights, intensity, colour temperature, hours, sensor/constant

operation, shielding, horizontal and vertical illuminance at the site boundary and at [redacted], and measures to

prevent glare and sky glow. Lighting should be designed to minimise unnecessary illumination while meeting genuine

safety and security requirements.

The assessment should address the cumulative interaction between light, night-time activity and noise, rather than

treating lighting as a purely visual design matter.

7. Surface water, drainage and groundwater

The Drainage Design Statement says that Phase 1 is on the northernmost hardstanding, described as the lowest part

of the site; that there is no suitable attenuation area in Phase 1; and that flows cannot presently be restricted to

greenfield rates.

It proposes continued use of existing collection, conveyance and outfall arrangements while stating that the exact

position, line and level of those arrangements are currently unknown pending CCTV survey. It also identifies an

approximately 440 m² concrete drop-off hardstanding whose flows are not presently intended to be restricted to

greenfield runoff.

Further intrusive ground investigation, groundwater information, contamination assessment, hydraulic modelling,

exceedance-flow design and outfall verification are also identified. Given the relationship to land north of the site, these

matters should be resolved sufficiently to demonstrate that [redacted] will not be exposed to increased flood risk,

polluted runoff or adverse groundwater pathways.

8. Foul water and wastewater treatment

The drainage material contemplates a cesspool for the initial phase, with tankering, followed potentially by an on-site

wastewater treatment works and final effluent discharge. The final plant/outfall arrangements are not fully fixed in the

published material.

Capacity, tanker frequency, emergency storage, alarms, failure response, sludge handling, noise, odour, permitting

and final effluent route should be established before relevant occupation or installation and assessed against Wild

Meadow.

9. Contamination and unexploded ordnance

The former military use, made ground and need for further contamination investigation raise potential

pollutant-pathway issues. The application also includes a separate Unexploded Ordnance Risk Assessment,

reflecting the site's historic ordnance role.

UXO is principally a construction health-and-safety risk, but intrusive drainage, foundation and utility works can affect

where and how ground is disturbed. The UXO findings should therefore be integrated with the construction

methodology and contamination strategy, so that investigation or clearance works do not create unmanaged pathways

MOD Bicester Site A - [redacted] Page 5

9. Contamination and unexploded ordnance (continued)

Historic land-use evidence materially strengthens the need for a site-specific contamination assessment. A historic

site plan supplied with this representation identifies the "Former location of A33 Burning Ground" within the A Site

area and shows the red-line area described as the part of A Site to be redeveloped by the Home Office. A former

burning ground is a potentially contaminative land use and should be expressly incorporated into the conceptual site

model, intrusive investigation strategy and assessment of source-pathway-receptor linkages.

The 2010 Entec Land Quality Assessment also records an ionising-radiation history at DSDA Bicester. It states that

Dstl Environmental Services Department records showed that a very large number of items of standard military

equipment containing radioactive material had been stored at the wider DSDA Bicester site from at least 1994 to the

date of that report. The radionuclides listed were tritium (H-3), nickel-63 (Ni-63), thorium-232 (Th-232), strontium-90

(Sr-90), chlorine-36 (Cl-36) and cobalt-57 (Co-57). It additionally records an instrumentation dial from a Canberra

aircraft cockpit containing radium-226 (Ra-226) as having been stored on the wider site since at least 1999.

These historic records do not, by themselves, demonstrate that radioactive contamination is present in the soil or

groundwater of the proposed development area. They do, however, identify a credible historic land-use issue which

should not be screened out without evidence. In planning terms, the applicant should demonstrate whether the former

A33 Burning Ground, radioactive-material storage history, made ground, ordnance use and proposed intrusive works

give rise to any relevant contaminant-pathway-receptor linkage.

This is particularly important because the proposal involves redevelopment, drainage and utility works capable of

disturbing ground and potentially altering surface-water or groundwater pathways. [redacted] and its associated

land lie north of the site and are identified elsewhere in the application as the nearest residential receptor. The

assessment should therefore address not only risks to future site occupants and construction workers, but also

potential off-site migration through soil, dust, surface water and groundwater towards neighbouring land.

Planning requirement requested

Before determination, the Secretary of State is requested to require a competent-person review of the historic Entec

material and the former A33 Burning Ground, followed by proportionate intrusive investigation where indicated. The

work should include a revised conceptual site model; targeted soil and groundwater sampling; consideration of

radiological screening where the historic evidence warrants it; assessment of interaction with UXO clearance and

drainage works; and a remediation/verification strategy with appropriate monitoring and contingency measures. The

conclusions should expressly assess [redacted] as an off-site receptor. If this information is deferred, any

permission should contain a pre-commencement condition preventing intrusive development in affected areas until the

investigation, risk assessment and any necessary remediation have been approved.

Page 4A

Page 4A

MOD Bicester Site A - [redacted] Page 5

for contaminated soil, groundwater or runoff towards neighbouring land.

The Secretary of State should require an integrated ground-risk strategy covering UXO, contamination, groundwater

and drainage works before intrusive development in relevant areas.

10. Highway and access safety

Construction and operation will generate additional vehicle movements on the local access network. If access to or

from [redacted] uses or interacts with the Thame Road/Widnell Lane corridor used by site traffic, the Transport

Assessment should demonstrate that the development will not materially prejudice safe access to the dwelling.

The assessment should address visibility, turning movements, peak construction traffic, coaches/minibuses, service

and tanker vehicles, pedestrian/cycle activity and any queuing or conflict near private accesses. Any historic inquiry

evidence concerning pedestrian or access safety at this location should be treated as contextual evidence and

checked against current highway geometry and current traffic conditions before reliance is placed upon it.

11. 'Temporary' status and the ten-year operational life

The official application page describes the proposal as a 10-year temporary use, while the Home Office factsheet

states that the site would be used for a minimum of 10 years. This matters when assessing infrastructure described

as interim or phased.

A cesspool, unconstrained Phase 1 drainage or other interim arrangements should not be accepted merely because

they are labelled temporary if they may serve a substantial occupied site during a development whose stated

operational horizon is at least a decade. The durability, capacity and environmental safeguards of each phase should

be commensurate with the realistic duration and intensity of use.

Any permission should clearly define the duration of each interim arrangement, the trigger for replacement by

permanent infrastructure and what happens if later phases or permanent connections are delayed.

12. Cumulative effects, information and conditions

The decision should consider cumulative effects at [redacted]: noise, traffic, generators, wastewater plant, dust,

lighting, drainage changes, groundworks and operational activity may each be modest in isolation but collectively alter

living conditions and rural amenity.

Before determination, the following information is requested:

1 A receptor-specific noise assessment for [redacted], including daytime/evening/night-time LAeq, LAFmax,

tonal/intermittent noise and external amenity.

2 A construction dust and air-quality management/monitoring strategy expressly identifying [redacted].

3 A lighting impact assessment and detailed lighting strategy showing spill/glare at [redacted] and the northern

boundary.

4 Completed drainage CCTV survey, topographical survey, hydraulic modelling, groundwater monitoring, outfall

verification and exceedance mapping.

5 A final foul-water strategy, including cesspool servicing and the full design/environmental assessment of any

wastewater treatment works.

6 An integrated contamination/UXO/groundwater strategy for intrusive works.

7 A highway/access safety review where Site A traffic interacts with access routes used by [redacted].

8 A cumulative environmental assessment drawing together the above effects at [redacted].

9 Confirmation that the EIA screening conclusion has been reviewed against the final defined project and the

outstanding technical information.

If permission is granted, these matters should be secured by enforceable conditions preventing relevant

commencement, installation or occupation until the evidence, design and mitigation have been approved,

together with post-occupation monitoring and defined corrective-action procedures.

13. Conclusion

[redacted] is the nearest residential receptor identified by the applicant. The published technical package contains

substantial information, but also records unresolved matters and does not consistently translate the studies into

receptor-specific predictions for [redacted].

The additional issues of EIA screening robustness, external lighting, UXO integration, highway/access safety and the

tension between interim infrastructure and a minimum ten-year operational horizon reinforce the need for a cautious,

evidence-led decision.

I respectfully request that the application be refused unless these evidential gaps are satisfactorily resolved.

In the alternative, any permission should include robust pre-commencement, pre-installation and pre-occupation

conditions, monitoring and enforcement mechanisms.

Submitted by: _____

Address / contact: _____

Date: _____

PART II - TECHNICAL APPENDIX

Appendix A - Noise Impact Assessment critique

Scope/gap: The report establishes the existing acoustic environment and residential criteria but does not provide a

clear prediction of operational noise from the proposed use at [redacted].

Required output: source inventory and sound-power data; facade and garden predictions; day/evening/night

assessment; LAFmax and tonal/intermittent characteristics; mitigation; verification monitoring; complaint protocol.

Appendix B - Air Quality Screening Technical Note critique

Operational screening: no detailed dispersion modelling and no sensitive receptors selected means there is no

numerical operational prediction for [redacted].

Construction: [redacted] is stated to lie close to the normal 250 m human-receptor dust screening distance and

should be explicitly identified in construction controls and any proportionate monitoring strategy.

Appendix C - Drainage and water-environment critique

Northern Phase 1: northernmost hardstanding/lowest part of site; no suitable attenuation area; Phase 1 flows cannot

presently be restricted to greenfield rates; existing drainage route/levels stated to be unknown pending CCTV survey.

Groundwater/outfalls: intrusive investigation, groundwater monitoring, contamination assessment, hydraulic

modelling, exceedance routing and outfall verification remain important to demonstrating no adverse effect north of the

site.

Foul water: initial cesspool and possible later WwTW require fixed capacity, servicing, failure, noise, odour, permitting

and outfall arrangements.

Appendix D - EIA/procedural, lighting, UXO and highway points

EIA procedure: The Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England)

Order 2025 provides special mandatory 30-day publicity/consultation provisions for EIA applications. The existing

non-EIA screening Direction therefore has procedural as well as substantive significance. The representation asks the

Secretary of State to ensure that the screening conclusion remains robust against the unresolved technical matters.

Lighting: security and operational lighting should be assessed at [redacted] for spill, glare, sky glow and hours of

operation, with a detailed lighting strategy.

UXO: the application includes an Unexploded Ordnance Risk Assessment. Its findings should be integrated with

groundworks, drainage and contamination controls.

Highways: where [redacted]'s access route interacts with Site A construction/operational traffic, safe access and

conflict risk should be explicitly assessed. Historic findings may be relevant context but should be verified against

current conditions.

Duration: the official application describes a ten-year temporary use and the Home Office factsheet states a minimum

ten years. Interim infrastructure should therefore have clear duration limits, replacement triggers and adequate

safeguards for the realistic operational period.

Appendix E - Source schedule and submission details

Source Point relied upon

MHCLG/GOV.UK application page 10-year temporary use; up to 1,256 service users; supporting documents include UXO

assessment; representation period 7-17 September 2026.

Home Office MOD Bicester factsheet States the site would be used for a minimum of 10 years.

MOD Bicester Site A - [redacted] [redacted] Page 8

Source Point relied upon

Town and Country Planning (Crown

Development) (Urgent Applications)

(Procedure) (England) Order 2025 /

Explanatory Memorandum

Special EIA procedure includes mandatory 30-day publicity/consultation; urgent Crown

decisions remain planning-merits decisions.

Planning Proposal Statement [redacted] identified as nearest residential receptor, approximately 296 m north.

Noise Impact Assessment Existing acoustic environment and external amenity guidance; receptor-specific

operational prediction for [redacted] requested.

Air Quality Screening Technical Note Operational screening/no sensitive receptors selected; construction-dust screening

methodology.

Drainage Design Statement Northern lowest hardstanding; Phase 1 drainage limitations;

survey/model/outfall/groundwater matters; cesspool and possible WwTW.

Unexploded Ordnance Risk

Assessment

Separate application document relevant to intrusive works on former ordnance site.

Submission details

MHCLG reference: PCU/RARE/C3105/3378843

Representation period: 7 September 2026 to 17 September 2026.

Email: Crowncasework@communities.gov.uk

The official GOV.UK application page was last updated on 4 September 2026 to confirm the representation period.

PCU/RARE/C3105/3378843 – MOD BICESTER SITE A, BICESTER GARRISON, LAUNTON ROAD, OXFORDSHIRE, OX25 1AE

Ludgershall Parish Council

Objection

Ludgershall Parish boundary is 2 miles from the proposed development site. Ludgershall village is one of the villages that make up the historic Bernwode group in Buckinghamshire close to the border with Oxfordshire. These villages, and particularly Ludgershall, are important in terms of their sensitive ecology, biodiversity, heritage, history and traditional rural way of life. The scale of the proposed development, particularly in terms of the numbers of male service users, will have a significant and detrimental impact on our culture and environment in the following ways:

Impact on women and children's recreation, freedom and human rights

It is a fact that the UK government has recently had to issue advice to asylum seekers regarding how to treat women and children which indicates that there are some valid safety concerns for us. We know that our close proximity to 1,256 men, some with the different cultural expectations alluded to in the government advice document, will mean our village women and children will inevitably be restricted in the interests of safety. The lack of detail in the planning application about the extensive recreation facilities that will be needed within the proposed site to occupy the men leads us to believe they will gravitate towards our village facilities. These village facilities include our community hub with free broadband and refreshments, an extensive village green with many benches /picnic tables, a well-stocked fishing pond, play area, village hall and popular village pub. These would all be attractive and inevitably open to abuse by large groups of unknown, unvetted men.

Children will no longer have the independence and freedom they are used to. Currently they are free to walk, run, ride their bikes, play games on the village green, fish in the brook and ponds with very little supervision. This is an expected part of traditional small village life and the proposed development will result in changes amounting to the loss of this amenity which is essential for our community and rural way of life. In smaller villages, like ours, play areas are important recreational facilities and meeting places for children. Ludgershall has an excellent play area with an attached woodland walk that children can access independently and safely. We have seen in news reports how children's use of playground facilities has been curbed due to men loitering near play facilities and

interfering with their important play opportunities. The UN Convention on the Rights of the Child (UNCRC) states that every child has the right to rest, leisure, play, and age-appropriate recreational activities.

We are also concerned that the freedom and opportunities for the women of our village may be affected. For example, women feel safe to walk alone during the day or night. They can safely use the footpaths around the village alone. They have the freedom to use the church, which is our community hub, the hall, the seats and benches and the pub for their recreational needs without fear of any interference. Older women, who live alone, feel able to have windows and doors open during hot weather without fear of intruders.

These freedoms will be curbed if this development goes ahead and would lead to a form of discrimination against rural women. The UN Convention on the Elimination of All Forms of Discrimination Against Women states parties must take all appropriate measures to ensure women have the equal "right to participate in recreational activities, sports and all aspects of cultural life."

With our current levels of crime, the police presence is at a very low level. We will need a significant increase in police patrols if women are to be kept safe. The planning application lacks sufficient information about how services will be deployed to ensure safety and security in the local area.

Impact on biodiversity and ecology

Ludgershall Parish Council considers the biodiversity and ecology of our area to be of great importance. Within our parish we have Ludgershall Meadows and Part of Upper Ray Meadows both have Wildlife Trust Nature Reserve Status and parts have SSSI designation. These special sites are part of a network of sensitive wildlife areas around the River Ray which also includes the Arncott Bridge Meadows SSSI site. The River Ray is ecologically vital because its surrounding floodplains support nationally rare habitats, diverse wildlife corridors, and critical wetland networks. The river's low-lying clay catchment feeds rare, species-rich floodplain meadows and grazing marshes that function as an interconnected riverine ecosystem. In our opinion any development that could damage this precious eco system should be avoided. The applicant's own ecological appraisal reports that the proposed development is within the Arncott Bridge SSSI's 'impact zone'.

We note that the desk study for the ecological appraisal in the applicant's supporting documents consulted BMERC about the biodiversity within the site

with no reports of endangered species. BMERC is for Buckinghamshire environmental records and therefore would not have recorded sightings for this site. Oxfordshire records MUST be consulted to give an accurate picture.

The applicant's ecological appraisal mentions the possibility of some richness in species on the site including the hazel dormouse, rare bats, birds nest sites, lizards GCN, rare butterflies including the Brown Hairstreak. We agree with the ecological appraisal that targeted surveys should be undertaken for these species. There should also be further monitoring as to whether otters, badgers and water voles are present. (We have visiting otters in Ludgershall.)

Given the richness of biodiversity in other parts of this interconnected riverine ecosystem of the River Ray (including the richness found in Ludgershall Parish and village) it would be unusual if this abandoned site has not had the opportunity to develop a rich ecology.

The drainage arrangements for this proposed site have not been made clear enough in the planning application and we believe that if connections to main drains (the proper sewage system) are not made then other temporary or unusual methods have the potential to cause pollution damage to the delicate local ecological systems.

Likewise, any temporary arrangements for the generation of electricity could also cause noise, vibration, emissions, pollution risk and inevitably lead to adverse ecological impacts.

AMBROSDEN PARISH COUNCIL

www.ambrosdenpc.org.uk

Mrs Jane Olds, Parish Clerk – [redacted]

To: crowncasework@communities.gov.uk 17 September 2026

Response to planning application

MHCLG reference: PCU/RARE/C3105/3378843

Cherwell District Council reference: 26/01833/CROWN

The Parish Council met on 17 September and considered planning application reference PCU/RARE/C3105/3378843 (CDC reference 26/01833/CROWN) at Bicester Garrison Site A Street From Blackthorn Bridge To Arncott Piddington for "Full planning permission for the temporary change of use of the former defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation. The Proposed Development comprises the retention and change of use of Building A6, the demolition of existing buildings and structures, the erection of new modular accommodation, and the provision of space for associated health and welfare facilities, site infrastructure, wastewater treatment plant, roads, access ways, security infrastructure, parking, staff accommodation and facilities, and open space and recreational areas, to accommodate up to 1,256 service users."

The Council strongly objects to the proposals and considers that insufficient information has been provided to demonstrate that the development would comply with the principles of sustainable development set out in the National Planning Policy Framework (NPPF) on the following grounds.

Previous planning history

The Council notes that the 2003 outline permission related to a materially smaller scheme for 750 "service users" and relied upon specific mitigation including improved pedestrian access and minibus provision.

Subsequent reserved matters proposals attracted objections concerning landscape impact, lighting and highway safety and the reserved-matters application was ultimately withdrawn. The Council, therefore, considers that the previous planning history should not be regarded as establishing the acceptability of the current proposal, which must be assessed on its own merits against current policy and evidence.

The Council further notes that even the smaller 2003 scheme relied upon improved pedestrian access and minibus provision as part of the mitigation for its isolated location. These earlier requirements reinforce the need for the present, substantially larger proposal to demonstrate that safe pedestrian access and sustainable transport arrangements are achievable.

Transport and Highway Safety

The application documents acknowledge that the site has limited accessibility by sustainable transport modes together with poor pedestrian connectivity to the surrounding settlements. The proposal relies heavily on managed transport arrangements. However

insufficient detail has been provided regarding service frequency, capacity, operating hours and long-term delivery.

The Council is particularly concerned that:

- existing pedestrian infrastructure in the vicinity of the site is minimal and the application has not demonstrated that pedestrians travelling between the site, nearby bus stops and local facilities in Ambrosden and surrounding areas would be able to do so safely;
- the proposal relies primarily on operational measures rather than physical improvements to pedestrian infrastructure;
- the Travel Plan relies upon post-occupation monitoring rather than demonstrating at the application stage that transport arrangements will be effective and sustainable, including how pedestrian and vehicle safety will be managed where routes lack adequate lighting and pedestrian infrastructure; and
- the plan for construction traffic associated with demolition, modular construction, plant, materials and HGV movements has not yet been adequately quantified.

The Council does not consider that the advice provided in the Travel Plan (3.3.4) which discourages walking and recommends use of Home Office minibuses because of the absence of pedestrian infrastructure constitutes adequate mitigation for deficiencies in pedestrian infrastructure. Safe pedestrian accessibility should be demonstrated through appropriate infrastructure and the physical characteristics of the routes available.

The Council notes that the references within the Travel Plan (3.2.1) to the B1104 appear inconsistent with the application documents, which identify the site access as the B4011. The applicant should therefore confirm and evidence that the traffic data and assessment relate to the correct highway before reliance is placed upon them.

Given the scale and duration of the proposed development, the Council considers that the likely highway impacts of both the operational and construction phases should be comprehensively assessed. Should planning permission be granted, a Construction Traffic Management Plan should be provided to control HGV routing, delivery times, road cleanliness and vehicle movements during peak traffic movements and school travel periods.

The Council, therefore, considers that further assessment is required to demonstrate that the proposal would not have an unacceptable impact on highway safety and that opportunities for sustainable transport must be appropriately addressed.

Impact on Local Infrastructure and Services

The proposed development would accommodate a substantial population for a period of up to ten years. The Council is concerned that the application does not adequately assess or address the impact on the local infrastructure and services, including public transport, healthcare provision and community facilities.

Ambrosden already supports a significant population associated with MoD Bicester together with resettled refugee families accommodated through government schemes. The Parish Council is concerned that the application has not adequately assessed the impact of a further population of up to 1,256 residents on the wider community,

particularly, healthcare provision, fire and rescue services, public transport, community facilities and local infrastructure. The Council considers that the capacity of these services, and any mitigation required, should be clearly demonstrated before planning permission is granted.

The NPPF requires that planning decisions ensure that adequate infrastructure is available to support development. The Council is not satisfied that the application demonstrates that the existing provision can accommodate the proposed demand or that necessary mitigation has been secured.

Utilities including Electricity, Drainage, Wastewater and Flood Risk

Section 4.2 of the Utilities Infrastructure Assessment identifies an estimated peak electrical demand of approximately 2.16 MVA whilst the capacity and configuration of the existing electricity network has not yet been fully verified. The application mentions temporary and/or permanent generator provision. However, until the number, type, location and operating hours of any generators are known, the Council does not consider that the associated noise, air quality, landscape, ecological and pollution impacts can be fully assessed.

The Utilities and Infrastructure Assessment also identifies limited capacity within the existing mains water network relative to concentrated development and states that the proposed potable water supply is subject to available capacity. The Council considers that sufficient water-supply capacity should be demonstrated before the development is occupied.

The application documents indicate that the long-term foul drainage solution remains unresolved and that further investigation is required regarding wastewater treatment and discharge arrangements. Significant uncertainty also remains regarding the condition and capacity of the existing drainage infrastructure.

The Council is concerned that:

- a deliverable permanent foul drainage strategy has not yet been demonstrated;
- surface water drainage proposals remain dependent upon additional surveys and investigations;
- the potential effects of drainage failure, flooding and pollution have not been fully assessed.

The Council, therefore, considers that insufficient information has been provided to demonstrate compliance with national and local policies relating to flood risk, water quality and sustainable drainage.

The Council notes that constraints on water and electricity infrastructure have already contributed to delays affecting other approved developments in the Bicester area, including the new Police Forensic Unit on Howes Lane and the *Greencore* residential development on Station Road in Launton. These wider infrastructure constraints should be fully considered when assessing the deliverability of utility provision for the proposed development.

Natural England has advised that potential significant effects on Arncott Bridge Meadows Site of Special Scientific Interest (SSSI) cannot be ruled out and has requested further information regarding hydrological connectivity and water-quality effects.

Ecology and Biodiversity

The applicant's Preliminary Ecological Appraisal identifies the need for further ecological investigations including additional bat surveys and consideration of impacts on protected species and habitats.

The Council notes that ecologists did undertake field survey work at the site. However, the appraisal records limitations to the survey work and identifies further targeted ecological surveys as necessary, including for bats and other protected species. The Council considers that the results of necessary surveys should inform the assessment and mitigation before determination where they are material to the acceptability of the development.

The Council also notes that the ecological records search described in the appraisal refers to the Buckinghamshire and Milton Keynes Environmental Records Centre, despite the application site being in Oxfordshire. The applicant should clarify why that record source was used and demonstrate that the ecological baseline includes the relevant local records for the application site and surrounding area.

The Council noted that:

- ecological survey work remains incomplete;
- the findings of recommended surveys are not yet available;
- the ecological effects of lighting, increased activity and associated infrastructure have not been fully assessed.

The Council considers that these matters should be resolved before determination of the application to ensure that biodiversity impacts are properly understood and mitigated.

Noise, Lighting and Rural Character

The development would introduce significant operational activity, lighting and mechanical infrastructure into a predominantly rural setting. The Council is concerned that the submitted assessments are based on desk-based assumptions regarding infrastructure which has not yet been fully, or appropriately, specified.

Until the final infrastructure requirements are known, the Council is not satisfied that the impacts upon the residential amenity, landscape character, biodiversity and the wider environment can be fully assessed.

Cumulative Impact

The Council considers that the proposal should not be assessed in isolation. The cumulative effects of the development alongside existing, already planned, development and activity in the area should be assessed in relation to:

- highways and public transport;
- pedestrian infrastructure;
- healthcare and emergency service capacity;
- utilities and wastewater infrastructure;
- drainage and flood risk;

- noise, lighting and air quality; and
- ecology and biodiversity.

The Council is concerned that the application does not adequately demonstrate the combined impact of these factors on the surrounding and local infrastructure.

Conclusion

Ambrosden Parish Council objects to the application on the grounds that insufficient information has been provided to demonstrate that the proposal would not result in unacceptable impacts on highway safety, sustainable transport, local infrastructure, drainage, ecology, residential amenity and the rural environment. The Council is particularly concerned that a number of fundamental infrastructure and environmental matters remain unresolved and are deferred to future investigations.

The Council further notes that the application relies on a substantial amount of future investigation, survey work and detailed design in relation to transport, utilities, drainage and ecology. The Council considers that sufficient evidence should be available to demonstrate the acceptability of the development before planning permission is granted, rather than relying upon future work to resolve fundamental issues.

Should the Secretary of State be minded to approve the application, the Council requests that all outstanding technical matters, surveys, mitigation measures and infrastructure requirements are secured through appropriately worded planning conditions and monitoring arrangements prior to commencement and occupation.

ARNCOTT PARISH COUNCIL

OBJECTION TO PLANNING APPLICATION 26 / 01833 / CROWN

M.O.D. BICESTER SITE "A" – NON DETAINED ASYLUM ACCOMODATION

15th SEPTEMBER 2026

Arncott Parish Council objects in the strongest possible terms to this current U.K. Government application to create an asylum accommodation centre for 1250+ single adult males on the land area known as M.O.D. Bicester "A" site.

The previous proposal in 2002 to create an asylum accommodation centre on the site was refused permission by both the Cherwell District Council and the planning inspectorate. The site was deemed to be inappropriate at that time and it is still inappropriate today. The reasons given for refusal at that time are still valid reasons for refusal today.

There is a tremendous amount of justified frustration and anger from people towards the totally abhorrent and undemocratic method that is being used by the U.K. Government to bypass the normal planning process and force through the implementation of its proposed plan to create this asylum accommodation centre with as short a time for consultation responses as possible. It's obvious to everyone that the present government has used an Urgent Crown Development application (derived from 2025 regulations) for this site because it knows full well that this application would be refused yet again by the Cherwell District Council and the planning inspectorate if the application was subjected to the normal planning process.

It's extremely disappointing that the Government officials who are responsible for this plan do not care about and have absolutely no regard to the consequences of what the opening of such an asylum centre at this location will have on the lives of the people who will be living locally to the site. It's obvious that the Government considers this to be totally irrelevant and is concerned only with political point scoring.

Overwhelming numbers of objections have been raised against the creation of this proposed asylum centre. Those objections are very legitimate, sound and valid and have been made available to the public and submitted to the U.K. Government by local authorities, agencies, health and welfare bodies, public groups and individual residents. All have expressed their concerns with regard to the effects that an asylum centre would have on the local area, the local ecology, the environment, public services, utilities, local villages and their residents and also the residents of the asylum centre. All have said and / or have written as to why this is the wrong site for an asylum accommodation centre. Despite all of the advice and reasoning put forward, the Government has chosen to stay blinkered and ignore all of that reasoning and advice in pursuit of the fulfilment of its very flawed plan.

Arncott Parish Council thoroughly endorses every one of those objections and agrees with the reasoning and arguments that those objections put forward. Arncott Parish Council therefore considers that there is no need to repeat the same reasoning, arguments and objections here.

However, Arncott Parish Council does wish to strongly convey to the Government the very real fears and concerns that the Arncott village residents have expressed to the parish councillors about their future safety should the asylum accommodation centre become a reality.

The number of 1250 + single adult males proposed to be housed on the site would be close to, if not more than, the total population of Arncott village. The nationality, personal history and backgrounds of the asylum seekers would unlikely be known. It is a recognised fact that the residents in asylum accommodation experience difficulties due to overcrowding, boredom and inadequate living conditions and they also suffer from high levels of mental distress. What will hundreds of unemployed men do with their time? It is likely that many of them will want to leave the site and gravitate towards Bicester town or the nearby villages - of which Arncott is one – to try and find something to do.

Arncott is one of several small local villages located in a rural countryside area very close to the site. Many of the female residents from the local villages currently walk on their own or with their dog(s) and children along the small roads, footpaths and across the fields that surround the area. All of those same women have told parish councillors that if the asylum accommodation centre opens, they would no longer do those walks. They have said that they would not feel safe doing so knowing that there are hundreds of sexually active adult males from unknown origins and backgrounds – none of whom would have a female partner / companion - housed close to the village and free to wander around the area as and when they please. They have said that they would be fearful about the possibility of being molested and / or attacked by one

or more residents from the asylum accommodation centre. It seems that this government does not want to understand and / or accept the genuine concerns and fears that these residents have about their safety but, of course, the asylum centre would not be anywhere close to where the government's MP's live so it wouldn't be a problem for them and in doing so the proposals fail to comply with current Health and Safety legislation.

Those concerns and fears can be considered as fully justified as there have been many instances of male asylum seekers being given custodial sentences for carrying out sexual assaults in the U.K. on young girls and women. It is more than very concerning when it is deemed necessary to issue asylum seekers with a booklet explaining to them, amongst other things, that the sexual harassment and rape of anyone in the U.K. is illegal. It's also a concern that they must also be told that women have the same rights as men and are allowed to earn their own money and make decisions about their own lives.

Given the large number – or density - of male asylum seekers that would be living near to Arncott and the local surrounding villages, it could be argued that the odds of such an offence taking place in and around the local area would be higher than if those same asylum seekers were more widely dispersed.

Arncott Parish Council requests that a poll is carried out in Parliament that asks all of the female MP's if they would feel safe walking on their own through the countryside or their own local area knowing full well that there are 1250+ sexually active males living within one mile or less of where they would walk. The prediction for the result of the poll is that all, or the large majority, of those female MP's would be fearful of doing such a walk and would say "No – that is not something I would feel comfortable in doing".

Should the asylum accommodation centre become a reality, both male and female village residents have expressed their fears to parish councillors of walking alone through the village – especially when it is dark. They are fearful of being confronted by groups of men who have walked from the asylum centre and into the village. Many instances of anti – social behaviour towards residents and property involving groups of asylum seekers have been recorded and reported in the towns of Wethersfield and Crowborough. Both of those towns now have uniformed security patrols set up by the residents of those towns to try and counter that problem. Trying to do the same thing in small rural villages will small populations will be a very difficult thing to do – if at all possible.

Arncott villagers have also expressed their concerns about a possible increase in the rate of local crime. Data shown from online research indicates that an increase in property crime, theft and burglary can be linked to an increase in the number of asylum seekers in a local area and is primarily due to the financial and social pressures that the asylum seekers are under due mainly to a lack of work rights and the time taken for the legal process to decide if they can stay in the U.K. or if they are to be deported.

Should the proposed asylum centre proceed the Parish Council would expect the government to provide Thames Valley Police to finance an increase in the local policing in the area to ensure that police presence is always available. Furthermore, the Parish would expect funding to provide a full, comprehensive CCTV system around the Village and look at other initiatives to support residents live their normal daily lives and protect residents and their property ?

Since the announcement of the plan to create the asylum centre, local property prices around the area have decreased. This will probably not give the government any concerns whatsoever as this would be something else that the government would consider to be irrelevant. However, to several of our village residents this has been catastrophic. Residents who were in the process of selling their house to move to a new location have seen the house sale fall through as the potential buyer(s) decided not proceed with the purchase because they did not want to live near to the asylum centre. Other residents have found themselves with a negative equity as their houses are now worth less than what they bought them for so they are somewhat trapped to where they now live and would find it very difficult, if not impossible, to finance a move to another area – assuming of course that they could find a buyer for their houses.

The Parish Council expects the government have to introduce some a compensation/purchase scheme to support residents who wish/need to relocate The government is solely responsible for creating this horrid situation for our villagers so it is right that the government should offer help to alleviate the problem.

Arncott Parish Council

15th September 2026

To:
The Secretary of State for Housing, Communities and Local Government
Planning Casework Unit

By email: Crowncasework@communities.gov.uk

Planning reference: PCU/RARE/C3105/3378843
Cherwell District Council reference: 26/01833/CROWN

Site: MOD Bicester Site A, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Proposal: Full planning permission for the temporary change of use of the former Defence Storage and Distribution Centre, including demolition, new modular accommodation and associated infrastructure, to accommodate up to 1,256 non-detained asylum accommodation service users.

FORMAL OBJECTION

Dear Sir/Madam,

As Chair of Blackthorn Parish Council - which sits 1.3 miles from MOD Bicester Site A I wish on behalf of the Parish Council to make a formal objection to the above planning application.

We request that the Secretary of State **refuse planning permission**.

Our objection is based upon the planning merits of the proposal and, in particular, upon matters identified in the Government's own application documents.

We do not object to individuals on the basis of their nationality, immigration status or personal circumstances. My objection concerns the **scale, location, design, infrastructure requirements and environmental and highway consequences of the proposed development**.

The Government's application describes a development accommodating up to **1,256 people**, together with approximately 130 staff, extensive modular accommodation, welfare and healthcare facilities, roads, parking, security infrastructure and a proposed wastewater treatment facility.

This is a major institutional development in a rural location and should be assessed accordingly.

1. The proposed development is fundamentally inconsistent with the sustainable-location objectives of the development plan

The Government's own Transport Assessment acknowledges that the site is in a **rural setting**, approximately 5 km from Bicester, 1.3 km from Piddington and 1.6 km from Arncott yet makes no mention of Blackthorn Village.

It further acknowledges that there are **limited amenities or facilities near the site** and that there are no other facilities within a 2 km walking distance.

This is important because the proposal is not merely for an occasional or low-intensity institutional use.It is for a population of up to 1,256 people. The Cherwell Local Plan seeks to direct growth towards sustainable locations and specifically seeks to limit inappropriate development in rural areas.

The Government's own Planning Proposal Statement refers to Cherwell Local plan policies as below

- Policy SLE4 requires development to facilitate sustainable transport;
- Policy ESD1 seeks development in the most sustainable locations;
- Policy ESD13 seeks protection of local landscape character; and
- Policy ESD15 requires development to respond appropriately to its context and deliver high-quality, safe and healthy places.

The proposal does not satisfactorily meet these objectives.

2. The Government admits that the site's sustainable transport accessibility is poor

This is perhaps the clearest admission in the Transport Assessment.

The Government states:

> "from the point of view of accessibility by sustainable travel modes the location of the site is not ideal."

The Government then seeks to justify the location principally because the development will be relatively self-contained and because minibuses will be provided.

That reasoning should not be accepted.

The planning system is intended to create places where walking, cycling and public transport are realistic choices. Here, the absence of those facilities is being treated as a reason to operate a private shuttlebus system.

That is not equivalent to providing sustainable accessibility.

The Government's own Transport Assessment identifies the fundamental problem:

- the site is rural;
- local facilities are limited;
- there are no existing footpaths through or accessible from the site;
- there is no suitable pedestrian infrastructure serving the site; and
- residents are consequently expected to use minibuses to access surrounding facilities

This conflicts directly with the objectives of Policy SLE4 and Policy ESD1.

3. The existing pedestrian infrastructure is inadequate for a development of this scale

The Transport Assessment confirms that there are approximately 1 metre-wide footways around parts of the southern site access, but no formal dropped kerbs or crossing facilities. It also confirms that there are no existing footpaths through or accessible from the site. Most significantly, the Government concludes

that because of the absence of pedestrian infrastructure, residents should use minibuses to access surrounding facilities.

This is unacceptable for a development accommodating 1,256 people.

A planning authority should not regard a location as suitably accessible where the proposed population must effectively be transported elsewhere because the surrounding pedestrian infrastructure is inadequate and unsafe.

The Government should instead demonstrate why a site with substantially better sustainable transport accessibility cannot be used.

4. The proposal conflicts with the Government's own NPPF transport principles

The Transport Assessment quotes the NPPF requirement that sustainable transport modes should be prioritised and that safe and suitable access should be achieved for all users.

It also records the requirement to prioritise pedestrian and cycle movements and facilitate high-quality public transport.

The proposal fails this test.

There is no convincing evidence that:

1. safe pedestrian connections can be achieved;
2. convenient cycling connections can be achieved;
3. high-quality public transport exists;
4. the development can operate without substantial private shuttle transport; or
5. the resulting transport arrangement represents a genuinely sustainable solution.

The fact that residents will be transported by minibuses does not convert an inherently isolated site into a sustainable location.

5. The transport assessment relies on an unusual operational assumption

The development will contain up to 1,256 residents.

The Government states that residents will not have personal vehicles and will be free to come and go from the site. This creates an unusual transport situation. The residents are free to leave the site, but the surrounding environment is not designed to accommodate substantial pedestrian movements. Consequently, the Government's operational model depends heavily upon organised transport.

This raises a fundamental planning question:

How many vehicle movements will actually be generated by 1,256 people who are free to leave the site but who cannot safely or conveniently access surrounding facilities on foot?

The assessment should provide a robust worst-case operational model rather than relying primarily upon the proposition that the site will be "self-contained".

6. The claimed self-contained nature of the development is not sufficient

The Government proposes a shop, healthcare, recreation, gym, dining, classrooms and other facilities on site. However, the Government itself acknowledges that residents will need to travel outside the site for some purposes but does not provide any further information on this.

The Transport Assessment confirms that shuttle buses and minibuses will be provided for external trips.

Furthermore, the Government's own assessment of the location acknowledges that there are very limited facilities nearby.

The development should therefore be assessed on the basis of its **actual operational transport demand**, rather than an assumption that it will be self-contained.

7. The B4011 is a rural road and the proposal would introduce a substantial new transport demand

The site takes access directly from the B4011.

The Government's traffic survey recorded approximately:

- 2,972 vehicles per day northbound; and
- 3,150 vehicles per day southbound,

with 85th-percentile speeds of approximately 53–54 mph at the northern site access.

This is not an urban environment with a comprehensive pedestrian and public transport network.

The development would introduce:

- staff traffic;
- service vehicles;
- deliveries;
- waste collection;
- emergency vehicles;
- taxis;
- minibuses;
- shuttle buses;
- construction traffic; and
- other operational traffic.

The consequences for the B4011 and surrounding rural roads therefore require particularly careful consideration. It should be noted that deaths and major road traffic accidents have occurred on the B4011. In fact outside the entrance to Blackthorn Village within the last 2 years we have had a child fatality on the B4011

8. The previous planning history does not establish that this development is acceptable today

The Government's Planning Proposal Statement records that planning permission was granted in 2003 for an Immigration Accommodation Centre accommodating approximately 750 asylum seekers. This IAC was for a detention centre not for an open one.

However, that development did not proceed and was ultimately abandoned.

The circumstances have materially changed.

The current proposal:

- is for up to 1,256 people rather than 750;
- is substantially different in physical form;
- involves extensive modular accommodation;
- has a different operational model;
- has different infrastructure requirements;
- involves a different environmental and policy context; and
- is being assessed under the current planning framework.

The 2003 decision therefore cannot simply be treated as establishing the acceptability of the present proposal.

Indeed, the Government's own documents record that the earlier Inspector and Secretary of State recognised deficiencies in pedestrian infrastructure around the site.

Those deficiencies remain relevant today.

9. The scale of the proposal represents a major intensification of use

The Government proposes approximately 14,471 sq m of new modular accommodation and associated infrastructure, together with a 3,105 sq m wastewater treatment plant and a 359 sq m pumping station.

The total proposed new floorspace is approximately **17,935 sq m**.

This is therefore not simply a temporary occupation of existing buildings.

It involves:

- demolition;
- substantial new construction;
- new roads;
- new utilities;
- new wastewater infrastructure;
- security infrastructure;
- extensive modular accommodation;
- lighting;
- parking;
- recreational facilities; and
- associated landscaping.

The development should therefore be treated as a major new built environment within a rural landscape.

10. The proposal conflicts with Cherwell Policy ESD13 on landscape

Policy ESD13 requires development to respect and enhance local landscape character.

It specifically states that proposals should not:

- cause undue visual intrusion into the open countryside;
- cause undue harm to important landscape features;
- be inconsistent with local character;
- impact areas of high tranquillity; or
- harm the setting of settlements and landmark features.

The proposal introduces a large concentration of two-storey modular accommodation and associated infrastructure into a rural setting. The Government itself proposes varied orientations, colours and groupings to reduce the perception of a "monolithic development". The need for these measures demonstrates the scale of the visual intervention.

The fact that mitigation is proposed does not mean that the underlying landscape impact is acceptable.

11. The development conflicts with Policy ESD15 on design and intensity

Policy ESD15 requires development to respect local context, scale, massing, landscape and topography.

It also requires development to deliver safe, attractive, durable and healthy places and to use land and infrastructure efficiently through appropriate density and development intensity. The proposal represents an exceptionally intensive institutional use in an isolated rural location.

The combination of:

- 1,256 residents;
- approximately 130 staff;
- two-storey accommodation;
- extensive security infrastructure;
- lighting;
- roads;
- parking;
- wastewater infrastructure; and
- ancillary facilities

creates a development whose scale is not compatible with the surrounding rural character.

12. Surface-water flood risk has not been adequately resolved

Policy ESD6 requires the sequential approach to flood risk and states that development in areas of flood risk should only proceed where there are no reasonably available lower-risk sites and the benefits outweigh the flood risks.

The policy also requires development to remain safe and operational and not increase flood risk elsewhere. The proposed development should therefore be tested against the actual flood risk of the site and not simply against whether mitigation can theoretically be designed.

The proposed development introduces a large amount of built development and associated hardstanding.

Given the scale of the proposal, the Secretary of State should require clear evidence that:

- the existing drainage system is adequately understood;
- all surface-water pathways have been identified;
- climate change allowances have been incorporated;
- no unacceptable flood risk will arise within the site;
- no additional risk will be imposed upon neighbouring land;
- emergency access will remain available during extreme rainfall; and
- the proposed drainage infrastructure can be maintained for the entire operational period.

13. The drainage strategy itself acknowledges significant uncertainty

The Drainage Design Statement confirms that the preferred approach was not selected at the present design stage because there was insufficient information to confirm its feasibility.

It further states that the proposed wastewater solution requires a new discharge permit and that the final discharge location has not yet been established. The document also says that the suitability of potential receiving watercourses must be established through site investigation and modelling. These are not trivial details. They go directly to whether the development can safely operate.

The application should therefore not be approved until these matters have been conclusively resolved.

14. The proposed wastewater arrangements are particularly concerning

The Drainage Design Statement states that during Phase 1 the development may be served by a cesspool, with waste tankered away. It then proposes that later phases would be served by an on-site wastewater treatment works. The document states that the final effluent discharge location remains to be agreed and that site investigation and modelling are required.

This is a significant infrastructure dependency for a development accommodating 1,256 people.

The Secretary of State should require a definitive wastewater strategy, including:

- confirmed treatment capacity;
- discharge arrangements;
- Environment Agency permitting;
- emergency storage;
- tanker requirements;
- failure contingencies;
- odour control;
- noise control;
- maintenance arrangements; and

- environmental monitoring.

Until these matters are established, the development's infrastructure requirements have not been demonstrated.

15. Water quality must be protected

Policy ESD8 states that development should not adversely affect surface or groundwater quality and that development should only proceed where adequate water resources exist or can be provided without detriment to existing uses.

This is particularly relevant because the site has a history of military storage and the Government's application identifies potential contamination. There is therefore a direct relationship between:

Ground contamination → drainage → wastewater → groundwater/surface water.

The Secretary of State should consider these issues cumulatively rather than as isolated technical matters.

16. Contamination and asbestos are material planning concerns

The Government's Transport Assessment records that the majority of the existing buildings, particularly the large warehouses, contain asbestos and are considered dangerous or unstable.

The planning documents also identify contamination as a material consideration.

Policy ENV12 of the saved Cherwell Local Plan provides that development on land known or suspected to be contaminated should only proceed where adequate measures can remove the threat to future occupiers and where development is not likely to contaminate surface or underground water resources.

The proposed use is particularly sensitive because the site will be occupied continuously by a large residential population.

I therefore request that the Secretary of State require a comprehensive contaminated-land assessment and remediation strategy before granting permission.

17. Ecology and protected species require particular caution

Policy ESD10 expressly requires relevant habitat and species surveys to accompany applications where a site may have ecological value. It also establishes the principle that significant ecological harm should first be avoided, then mitigated and only as a last resort compensated. Natural England's correspondence also makes clear that its pre-application advice is not a final statutory consultation response and that final judgement is reserved until the application and full information are available.

It would therefore be inappropriate to assume that earlier Natural England advice establishes that ecological effects are acceptable. In addition it should be noted that the ecology survey was completed using the wrong database of information - The Thames Valley Environmental Records Centre (TVERC should have been used to discover the Ecology of the site as 88% of the Oxfordshire site is covered by TVERC - an incorrect database of BMERC was used which is in the next county

The Secretary of State should ensure that all necessary surveys using the correct database of environmental records is used TVERC and mitigation measures are completed and independently reviewed before permission is granted.

18. The relationship with Arncott Bridge Meadows SSSI requires careful assessment

The site is located in the wider area associated with the Arncott Bridge Meadows SSSI.

Given the scale of the development and the proposed drainage and wastewater arrangements, the potential hydrological relationship between the site and downstream ecological receptors requires particular attention. This is especially important where the final wastewater discharge arrangements have not yet been established.

The precautionary principle should therefore apply.

19. Lighting and night-time effects require careful consideration

The development will operate continuously and requires substantial security infrastructure.

This creates a fundamentally different lighting environment from the existing rural site. The Government's own Planning Proposal Statement records that the previous proposal generated concerns regarding lighting intrusion into the night-time environment and potential effects upon drivers using the B4011.

The current proposal should therefore demonstrate that lighting will not:

- urbanise the rural landscape;
- adversely affect neighbouring properties;
- disturb wildlife;
- create glare for motorists;
- affect dark-sky conditions; or
- materially alter the character of the surrounding countryside.

Policy ESD15 expressly requires artificial-light impacts on local amenity and intrinsically dark landscapes to be limited.

20. Noise and environmental pollution

Saved Policy ENV1 states that development likely to cause materially detrimental levels of noise, vibration, smell, smoke, fumes or other environmental pollution will not normally be permitted.

The policy expressly recognises traffic generation as a potential source of environmental pollution.

The current proposal has the potential to generate:

- continuous operational noise;
- delivery traffic;

- waste collection;
- shuttlebus movements;
- generator noise;
- generator fumes
- wastewater-treatment noise;
- security lighting;
- construction noise; and
- vehicle movements throughout the day.

These effects need to be assessed cumulatively.

21. Energy infrastructure has not been sufficiently demonstrated

The development requires substantial electrical infrastructure.

The Secretary of State should require confirmation that the proposed electrical supply can be provided from an appropriate permanent source and that any temporary generation does not result in unacceptable:

- noise;
- air pollution;
- greenhouse-gas emissions;
- fuel-storage risks;
- delivery traffic; or
- visual impacts.

The development should also demonstrate compliance with Cherwell's climate-change and sustainable-construction policies.

22. The development should be considered against the cumulative impacts on surrounding communities

The proposal is not occurring in an empty landscape.

The Government's own Transport Assessment identifies:

- HMP Bullingdon approximately 500 metres south of the site;
- a traveller site south of Widnell Lane;
- Piddington;
- Arncott;
- Bicester; and
- surrounding agricultural and rural land.

The cumulative consequences of these uses should be considered.

In particular, the Secretary of State should consider whether the combination of:

- existing prison-related activity;

- the proposed large accommodation centre;
- existing and proposed traveller accommodation;
- construction activity;
- additional traffic; and
- rural highway constraints

creates an unacceptable cumulative effect on infrastructure, highway safety and community amenity.

23. The ten-year "temporary" description requires an enforceable mechanism

The Government's Transport Assessment expressly states that the facilities are being designed to operate for **longer than ten years if required**.

That is highly material.

A ten-year permission should not effectively become an indefinite permission by allowing the physical development to remain capable of operation beyond that period.

If permission is granted, there should be:

1. an unequivocal end date;
2. no automatic continuation;
3. a clear requirement for decommissioning;
4. restoration of the land;
5. removal of temporary structures;
6. removal of temporary infrastructure; and
7. restoration of affected land and habitats.

24. The application should not be approved merely because it is being processed through the Urgent Crown Development procedure

The use of the Urgent Crown Development procedure does not remove the requirement to assess the planning merits of the proposal.

The Government's own guidance confirms that representations will be taken into account where they raise material planning considerations relevant to the development.

Urgency cannot itself make an otherwise unsuitable location suitable.

Nor should the expedited procedure result in unresolved technical matters being transferred into post-permission conditions where those matters are fundamental to the acceptability of the development.

25. The Government's own evidence establishes a conflict with the development plan

The Government has itself identified the relevant Cherwell policies.

Those include:

Policy SLE4 – Improved Transport and Connections

The proposal is dependent upon private shuttle transport because the site has poor sustainable accessibility.

Policy ESD1 – Mitigating and Adapting to Climate Change

The location does not minimise travel and the proposal introduces substantial infrastructure and transport requirements.

Policy ESD6 – Sustainable Flood Risk Management

The site requires careful assessment of flood risk and drainage.

Policy ESD7 – Sustainable Drainage Systems

The development requires substantial new drainage infrastructure.

Policy ESD8 – Water Resources

Water quality and wastewater discharge require resolution.

Policy ESD10 – Biodiversity

Ecological effects and protected species require appropriate investigation and mitigation.

Policy ESD13 – Local Landscape Protection

The development represents a major visual and landscape intervention in a rural setting.

Policy ESD15 – Character of the Built and Historic Environment

The scale, massing, intensity and infrastructure of the development require particular scrutiny.

Saved Policy TR7 – Traffic on Minor Roads

Development generating significant traffic should have appropriate access to major routes.

Saved Policy TR10 – Heavy Goods Vehicles on Minor Roads

Frequent HGV movements on unsuitable rural roads are specifically discouraged.

Saved Policy ENV1 – Pollution Control

Noise, fumes, traffic and other environmental pollution must not materially harm the environment or residential amenity.

Saved Policy ENV12 – Contaminated Land

The site must be demonstrated to be safe for its proposed use and must not create unacceptable contamination risks.

These policies are not matters raised retrospectively by an objector. They are policies which the Government itself has identified in its planning statement.

26. The planning balance weighs against permission

We recognise that the Government considers that there is a national need for additional asylum accommodation.

That need is capable of being given significant weight.

However, the existence of need does not establish that this particular site is suitable.

The planning balance must consider:

- the rural location;
- inadequate pedestrian infrastructure;
- limited public transport;
- substantial reliance upon shuttle transport;
- highway impacts;
- landscape effects;
- drainage constraints;
- wastewater uncertainty;
- water-quality risks;
- contamination and asbestos;
- ecological considerations;
- lighting;
- noise;
- energy infrastructure;
- cumulative impacts; and
- the exceptional scale and intensity of the development.

The Government has not demonstrated that these impacts can all be satisfactorily avoided or mitigated.

27. Request for refusal

For the reasons set out above, Blackthorn Parish Council respectfully request that the Secretary of State refuse planning permission.

In particular, We consider that the proposal:

1. is not appropriately located in terms of sustainable transport;

2. does not provide safe and convenient pedestrian connectivity;

3. would impose substantial additional transport demand upon rural roads;

4. represents an excessive intensity of institutional development in a rural location;

5. has not adequately demonstrated that drainage and wastewater infrastructure can safely serve the proposed population;

6. has not sufficiently demonstrated that flood risk can be managed without increasing risk elsewhere;

7. raises unresolved contamination and asbestos issues;

8. requires further ecological assessment and appropriate protection of biodiversity;

9. would materially change the character and appearance of the rural landscape;

10. raises potentially significant lighting, noise and pollution impacts;

11. has not demonstrated a satisfactory long-term energy solution; and

12. is not sufficiently demonstrated to comply with the relevant policies of the Cherwell development plan.

Alternative request

If the Secretary of State is nevertheless minded to approve the application, Blackthorn Parish Council respectfully request that the application **not be determined until the outstanding technical matters have been fully resolved and made available for public examination**, particularly:

- final drainage design;
- flood-risk modelling;
- wastewater capacity and discharge arrangements;
- Environment Agency permitting;
- contamination and asbestos investigation;
- protected-species surveys;
- ecological mitigation;
- highway and pedestrian-safety measures;
- complete operational traffic modelling;
- shuttlebus trip generation;
- energy-supply arrangements;
- generator requirements;
- lighting strategy;
- noise assessment;
- fire and emergency arrangements; and
- a legally enforceable ten-year decommissioning and restoration mechanism.

The Government's own documents demonstrate that this is a complex and unusually intensive development.

The fact that the application is being progressed under an urgent Crown procedure should not result in fundamental planning matters being left unresolved.

Final submission

This application should ultimately be determined on the evidence.

The evidence supplied by the Government itself demonstrates that the site has significant constraints and that the development is dependent upon substantial mitigation and infrastructure.

In particular, the Government expressly acknowledges that the site's accessibility by sustainable travel modes is **"not ideal"**, that surrounding facilities are limited, and that residents will depend upon minibuses for access to external facilities.

The proposal would therefore place a population of up to 1,256 people in a location where the Government's own evidence demonstrates that the basic sustainable transport infrastructure is inadequate.

Combined with the unresolved drainage, wastewater, contamination, ecological, landscape and infrastructure issues, Blackthorn Parish Council considers that the proposal has **not demonstrated that this is a suitable location for development of this scale and intensity**.

We therefore respectfully request that planning permission be **REFUSED**.

Yours faithfully,

Chair of Blackthorn Parish Council

Mrs Jennifer Lamont

Meeting at Blackthorn Village Hall

Thame Road Blackthorn

OX25 ITE

[redacted]

Oakley Parish Council

Oakley Village Hall

Oakley

Bucks

HP18 9QY

17 September 2026

Dear Sirs

Re: Urgent Crown Application PCU/RARE/C3105/3378843 - Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

I write on behalf of Oakley Parish Council to express, in the strongest possible terms, our objection to the proposed asylum centre at Bicester Site A.

Oakley is a village situated on the B4011, approximately 3.5 miles to the south of Site A. We are a small village of just over 400 households and with a population of circa 1100 residents. The village has one pub, a garage and a primary school along with a well-used village hall, children's play area and community shop all of which overlook the village playing fields and form the heart of our community. Despite the proximity of our village to the proposed site and it being promoted as a potential cycling destination for "service users" we, like other neighbouring villages such as Piddington, have had no contact from or consultation with any representatives of the Home Office, MHCLG or indeed anyone in Government or authority. We consider this shameful on the part of the Government and completely unacceptable.

There is obviously huge concern in the village at the potential impacts of the proposals on the locality and our community, particularly as it has been made clear that the proposed camp will not be a "detained" facility and that "service users" (as they are referred to in the application documents) will be free to leave the camp on foot (and it appears on bikes or via mini-bus shuttles) at any time they choose. As a potential destination for such outings, residents in our village are genuinely fearful for their safety and the impact this development is likely to have on our community as well as other nearby villages such as Piddington, Blackthorn, Arncott, Brill, Boarstall and Ludgershall.

Deficient Application Documents and Assessments

Having reviewed the application documents within the limited timeframe available, we start by making the general point that this one of the poorest, most deficient planning applications that we have ever seen for a development of this magnitude. Whilst the flaws in the application documents are so numerous, we highlight, in particular, the following:

(i) Substantial elements of application documents have been redacted thus prejudicing the ability of members of the public and other consultees to make a meaningful assessment of elements of the proposals. It is understood that certain layout plans may be sensitive for security reasons, but there is no reason why details of the risk assessments and security arrangements that will be in place to protect the local community cannot be made public for consideration. This is not "sensitive information" and the public are prejudiced by its non-availability. This should be addressed and the relevant sections of the documents made available before the application can be determined;

(ii) The Flood Risk Assessment, Drainage Design Statement, Utilities Assessment and Ecology Assessments/PEA are all completely deficient and do not enable the decision maker to rationally or reasonably conclude anything in terms of compliance with the relevant policy requirements (other than that they are not complied with) nor whether or not there are likely to be significant adverse effects on the environment or adverse effects on protected species or ecology arising from the proposed development. The ecological reports, in particular, identify the potential for adverse impacts on numerous protected species (highly protected including bats, newts, barn owls and nesting birds) or habitats on site likely to support such species and yet there is no survey data available to establish the presence (or otherwise) of those species on the site nor the level of impact upon them nor detail of what any mitigation or compensation measures will be. There are simply recommendations for numerous further surveys which should have been done prior to the application. This is completely inappropriate and, we would suggest, unlawful. It must certainly be questioned how a negative EIA screening opinion can be lawfully issued when the evidence provided on these points (and the drainage as referenced below) is so demonstrably lacking. It is one thing to identify an impact and the likely extent of that impact and then place reliance on identified and established mitigation measures. However, that is not what the applicant does here. There is no assessment of what the actual impacts are and no detail at all about how they can or will be mitigated other than suggesting that any impact will be dealt with at design stage. It is noted also that the responses from Natural England in relation to the screening are from their Discretionary Advice Service (a paid and non-binding pre-application officer opinion service). As such, they are not a formal consultation response and they also acknowledge they have not had any sight of many of the relevant details (for example the drainage proposals);

(iii) The Flood Risk Assessment and Drainage Statement make clear that the applicants actually know nothing at all about the existing surface water drainage pathways from the development (again, everything is left to future surveys) and palpably do not demonstrate that no built development will be on areas at risk of flooding (in

fact they acknowledge that Phase 1 will be) nor that users will remain safe from flood risk for the lifetime of the development nor that flood risk will not be increased elsewhere. This being the case, the proposals do not satisfy the requirements of paragraph F5 or F7 of the NPPF (nor ESD6 of the Cherwell Local Plan) and a sequential test should be undertaken. Given the nature of the development and its proposed use, the "catchment area" for any such search should be nationwide;

(iv) No risk assessment in terms of the risk to the local community has been provided (although the application documents state that "*appropriate risk assessments have been undertaken*") nor is there any assessment of the risk of crime or data providing details of levels and rates of crime committed by those passing through the asylum system (i.e. those likely to be housed in this development). This is clearly a material consideration which has been raised by multiple local communities. We are aware that such assessments have been requested from the Home Office by local residents but not provided. We are aware also that such data has been regularly requested from the Government at a national level and withheld. MHCLG must request and make available this assessment/data so that the impacts on and risks to the local community can be properly identified, considered and weighed in the balance when the application is determined;

(v) The Transport Assessment, when looking at the accident history on the B4011, only looks at a stretch of said road 500m either side of the site entrance whilst, simultaneously, recommending that cycling by "service users" and employees should be encouraged and highlighting an 8km "zone of influence" for cyclists. Restricting the accident data to such a small section of the road enables the assessment to conclude that there have only been 3 accidents in a 5-year period (although actually that is quite a lot for such a short and largely straight section of road). However, if one looks at the wider B4011 (virtually all of which is within that 8km radius) accident data over the last 5-year period for which data is available, there were 27 collisions on this road between April 2020 and April 2025, resulting in 40 casualties, 2 fatalities and 8 of which were classed as "serious."[1] The Transport Assessment therefore presents a misleading picture.

In short, we have been advised that any grant of planning permission based on the current suite of assessments and documents will almost certainly be unlawful and subject to successful challenge in the courts unless multiple deficiencies are addressed and further information provided, both to the MHCLG and also to members of the public.

Main Objections to the Proposals

[1] Data taken from Roadcrash.co.uk

In addition to (or in some cases having regard to) the above points Oakley Parish Council objects to the proposals for the following reasons:

(i) ***Not Sustainable Development***

The proposals are not sustainable development for the purposes of paragraphs S3 and S5 of the NPPF or indeed SLE3 or BSC2 of the Local Plan. For the reasons set out above and below, they do not fulfill key elements of both the social and environmental objectives of sustainable development set out at paragraph 17 of the NPPF. Under paragraph S5 (2) where proposals conflict with just one of the national decision-making policies under the NPPF, the benefits of a proposal are likely to be outweighed by the adverse effects. Here, we contend that the conflict with multiple such policies as well as Local Plan policies and other material consideration indicating refusal.

(ii) **Flood Risk and lack of sequential test**

As outlined above, the FRA is clearly deficient. The applicant has not demonstrated that no built development will be on areas at risk of flooding nor that users will remain safe from flood risk for the lifetime of the development nor that flood risk will not be increased elsewhere. In fact, the Drainage Statement expressly states that for Phase 1 (which contains significant amounts of built development, including residential units located on the lowest part of the site which is acknowledged to already flood and be at risk of flooding) the applicant does not have any details of how the existing surface water drainage operates and that due to site constraints they are not proposing to and are not able to attenuate or control surface water flows from this phase of the development. This is contrary to Local Plan ESD6 and NPPF paragraphs F1, F5 and F7. It is also directly contrary to what Natural England were told by the applicant in its email of 16th July and upon which they based their most recent response.

(iii) **Highway Safety**

Whilst we would argue that any reliance on the Secretary of State's 2003 decision as establishing the "acceptability of the site in principle" for asylum accommodation is misconceived (because the professional planning Inspector found it wasn't acceptable but was overruled for political reasons) one thing the Inspector and the Secretary of State did agree on at the time, is that the provision of pavements and pedestrian infrastructure in the vicinity of the site is deficient. The Inspector at the time recommended refusal on the basis of the risk of accidents involving pedestrian asylum seekers. We would echo that concern and highlight that the transport assessment here once again acknowledges that there is "*no pedestrian infrastructure serving the site*" and that in terms of sustainable travel options the site is "*not ideal*." It should be noted that the applicants suggested response to concerns regarding pedestrian safety (as "service users" can leave the site on foot whenever they want) is to issue high visibility vests to anyone leaving the site on foot, a solution that is frankly laughable.

Moreover, the applicant now also suggests that instead "service users" and employees should be encouraged to cycle to nearby towns and villages, along a main road with multiple sharp bends and undulations, a 60mph speed limit and a poor accident record (see above) in a country they are unfamiliar with. The potential hazards and level of risk arising from this proposal are obvious. It is clearly unsafe and unacceptable both for motorists using the local road network and "service users" trying to navigate it.

The proposals are therefore contrary to policies SLE4 and DP3 of the Local Plan and paragraphs T3 and TR6 of the NPPF.

(iv) Impact on communities - crime, fear of crime, health and social cohesion

It is already well established that public safety, risk of crime and fear of crime (where reasonable) are material considerations to be taken into account where they are relevant to a proposal. The latter is also acknowledged as having impacts in terms of community cohesion and the mental health of nearby residents. In addition, the NPPF paragraph P5 (1)(b) states that at locations where large numbers of people are expected to congregate (which this clearly is):

"*Proposals for major development in such locations should be informed by the most up-to-date information available from the police and other relevant agencies about the nature of potential threats and their implications, and appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security*."

Paragraph P5 (1)(a) highlights also the need to identify and mitigate safety risks associated with development, particularly where certain groups (such as women and girls) "*may be vulnerable to crime or fear of crime*."

This is a rural area with extremely limited police officer resource. Any increase in crime or fear of crime will have a significant impact on our communities and could, for example, deter residents from using facilities such as the children's play area or playing fields to the detriment of community and social cohesion.

What limited content there is within the application documents relating to crime or public safety has been redacted thus making it impossible for members of the public or third parties to know what has been assessed or is proposed in this regard. This is clearly prejudicial to the public and must be rectified. However, it is also noted that the planning statement states that a form of risk assessment has been carried out yet that assessment is not available and no proper assessment appears to have been undertaken as to the risks to the local villages and community. In addition, the Home Office and the Ministry for Justice have been asked (both in the context of this application and generally in the public domain in recent months) to provide the available data and information about the

levels of crime committed by those within the immigration and asylum system and have repeatedly refused to do so.

Daily reports of arrests, charges and convictions of those passing through the asylum system for serious offences coupled with what data there is available of levels of convictions by nationality and the Home Office's recently issued guidance note to asylum seekers, "*Understanding behaviours and expectations in the UK; a guide for asylum seekers*" demonstrate clearly that local residents fears in this regard are reasonable and justified. The risks associated with this type of "undetained" accommodation are obvious and foreseeable. In the last 24 hours alone, Government Ministers have been on news broadcasts referring to the "serious issues" that were caused in communities when asylum seekers were housed in hotels. The proposals are thus contrary to paragraph P5 of the NPPF and contravene the social objective of sustainable development set out at paragraph 17.

Local residents should not be deterred from using the many Public Rights of Way in the area, and this proposal will inevitably reduce the use of the PROW system and the diminish the many benefits of accessing outdoor spaces.

In determining any planning application, the decision maker is legally required to consider any relevant material considerations. In so doing, they must have enough evidence and information before them to enable such consideration. MHCLG clearly do not have sufficient (or indeed any) evidence on this issue and must insist that the relevant data is provided to it and made available to the public. In addition, as a Government generally, and for MHCLG as the decision maker in this instance, there is also a duty, under Article 3 of the ECHR not to take steps which would expose its citizens to the risk of Article 3 ill-treatment through inhuman or degrading treatment. Exposing citizens to a foreseeable (in the absence of evidence to the contrary) risk of crime by allowing this proposal would, in our view, fall into that category and thus be a breach of local citizens' human rights under the ECHR.

(v) Contamination and Ground Conditions

Contrary to paragraph P2 of the NPPF, adequate site assessment has not been undertaken. Proposals introduce a residential use onto a site known to be contaminated or where there is a significant risk of contamination and, it appears, with no details of or proposals for remediation contrary to paragraph L2 of the NPPF. It is also inexplicable that the UXO assessment identifies that there is likely to be unexploded ordnance on the site but then (actually with no explanation) concludes the risks in this regard when proposing to house thousands of people on it are "low".

(vi) Air Quality and pollution

Finally, the proposals make clear that the development will not conform with the Councils energy hierachy under the Local Plan and that the development will be served by generators, presumably running on diesel or some other fuel. The impacts of this in relation to air quality, protected species and ecology do not appear to have been assessed. It is contrary to paragraph P3 of the NPPF and policy ESD2 of the Local Plan.

Conclusions

To conclude, Oakley Parish Council **strongly objects** to the proposed development which will potentially blight and have negative impacts on our community and other nearby rural villages (and Bicester) for at least a decade. Our residents are deeply opposed to it and are genuinely fearful for their safety and the impact on their community should it go ahead.

We have outlined above how it is contrary to multiple Local Plan and NPPF policies. NPPF Paragraph S5 (2) states that where a proposal is contrary to just one of the national decision making-policies in the NPPF then the benefits of approving development are likely to be substantially outweighed by adverse effects and therefore it should be refused. Here, it is contrary to multiple such policies, in addition to the clear harm that arises from the conflicts with the development plan as well as the risk to health from fear of crime and the unassessed but obvious risks to our communities arising from these proposals. Furthermore, the assessments and information available to the MHCLG are so deficient that we submit the Secretary of State cannot lawfully conclude that permission should be granted. We therefore urge the Secretary of State to refuse this application.

Kind regards

Joanne Grey

Chair, Oakley Parish Council

From: [redacted]
[redacted] Crown Casework
Cc: [redacted]
Subject: Representation from Fencott and Murcott Parish Council
Date: 17 September 2026 11:59:42

You don't often get email from parishclerk@fandmpc.co.uk. Learn why this is important

Fencott and Murcott Parish Council objects to the proposed temporary change of use of the former defence storage & distribution centre site (MOD Bicester A Site) in connection with the phased provision of non-detained asylum accommodation.

There are significant issues for road safety including, but not limited to:
Large numbers of pedestrians walking to nearby Bicester and villages on busy A roads with no pavements.
Existing public transport is not equipped to deal with higher demand it does not even meet current demand.

There are environmental issues including, and not limited to:
Asbestos at the proposed site.
Further pressure on an inadequate sewerage system.
Greater demand on existing energy connections.

The proposed site demand would put strain on utilities that already cannot meet the current needs of the area and means that there is no capacity for new housing developments to be built despite planning permission being granted.

From: Crown Casework
To: [redacted]
Subject: FW: PCU/RARE/C3105/3378843 Asylum Centre application - Parish
Date: 24 September 2026 17:25:51
Attachments: image001.png

[redacted]

OFFICIAL-SENSITIVE - MHCLG ONLY

From: David Slingo [redacted]>
Sent: 17 September 2026 21:43
To: Crown Casework <Crowncasework@communities.gov.uk>
Cc: Horton PC [redacted]>
Subject: PCU/RARE/C3105/3378843 Asylum Centre application

You don't often get email from hcspcslingo@gmail.com. Learn why this is important

I write on behalf of Horton-cum-Studley Parish Council in response to the above Urgent Crown Development application. Whilst we are not a mandatory consultee, our parish lies within five miles of the proposed Asylum Centre in a rural part of Oxfordshire, with a population approaching 500 (2021 census).

The Parish Council acknowledges that there is a need to provide suitable asylum accommodation (whatever the characteristics of the prospective occupants), and the stated objective of reducing reliance on hotels is clearly in the best interests of our nation. However, the Parish Council objects to the application as currently made, on the basis of the following:

1. There is inadequate information provided on the proposed site layout, design and elevations. This is below the level of detail normally expected of a 'full application' to enable due planning consideration and given such an important issue, the claimed 'urgency' is no excuse for the absence of properly considered, detailed plans.

2. The introduction of an additional 1250 'residents' has significant impact on established communities, public-service and healthcare capacity, across this part of the county and there is little evidence that proper consideration has been given to this in the application, contrary to the normal assesment of 'residential amenity' and 'highway safety' within a large scale development.

3. There is no evidence that the proposal will result in safe pedestrian access and transport arrangements, in a rural area lacking suitable road and footpath infrastrucure for an increase of 1250 pedestrians and associated vehicular traffic. The application should demonstrate that proper consideration of the impact on and risk assessments for have been satisfactorily completed in respect of both the proposed site and the surrounding communities. Specifically in relation to transport, the rural area between Bicester and Oxford already lacks adequate transport facilities and our parish is reliant on a single (small) bus service which operates up to five times each day (Monday to Saturday), stopping only on one return

journey at Piddington, the nearest settlement to Site A.

4. The application requires a full, accurate and up to date assesment of ecology, trees, lighting, surface water/drainage and flooding as essential matters for consideration prior to any planning approval. The information thus far released does not address all of these matters adequately.

David Slingo,
Chair Horton-cum-Studley Parish Council
http://horton-cum-studley.org.uk/

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