Matthew Barber
Police & Crime Commissioner
for Thames Valley

Office of the Police & Crime Commissioner
The Farmhouse, Thames Valley Police HQ
Oxford Road, Kidlington, OX5 2NX
[redacted]
www.thamesvalley-pcc.gov.uk

14 September 2026

Dear Secretary of State,

Re: Urgent Crown Development Application, MOD Bicester Site A (PCU/RARE/C3105/3378843)

I am writing in my capacity as Police and Crime Commissioner for Thames Valley regarding the proposed temporary change of use of MOD Bicester Site A to provide non-detained asylum accommodation for up to 1,256 residents for a period of up to ten years.

Whilst I recognise the importance of providing appropriate accommodation for asylum seekers, I have significant concerns regarding the planning implications of a development of this scale and its potential impact on community safety, infrastructure, safeguarding and the sustainability of the local area.

Scale of the Change

A particular concern is the scale of the proposed development relative to the existing local community. Accommodating up to 1,256 residents on a single site would represent a substantial and immediate change to the character and function of the area, effectively creating a new community of a size that would represent a significant and sustained increase in the local population, with consequential implications for infrastructure, public services and community integration.

Communities typically adapt to population growth incrementally, allowing local infrastructure, public services, community networks and support arrangements to evolve over time. In contrast, this proposal would introduce a very significant population increase over a short period, creating pressures that are fundamentally different in scale and pace.

Given the magnitude and speed of this change, I am not satisfied that the application sufficiently demonstrates how the resulting impacts on community safety, public services, local infrastructure, safeguarding arrangements and community cohesion have been assessed, nor how any adverse effects would be effectively mitigated. The application does not, in my view, provide adequate assurance that the area can accommodate such a substantial change without significant implications for the safety, sustainability and resilience of the local community.

Community Safety and Demand

A development of this size will inevitably generate additional demand on local public services, including policing, safeguarding and wider partnership agencies.

Whilst additional service demand is not, in itself, a reason to refuse development, the planning process should be satisfied that appropriate management, governance and support arrangements are in place to prevent unacceptable impacts on local communities and to ensure that both existing residents and those accommodated on the site are able to access the services they require.

The application provides limited assurance regarding site management, safeguarding arrangements, community safety measures, incident management processes and the interface with local agencies responsible for public protection and community safety. In particular, it is unclear whether sufficient consideration has been given to the cumulative impact of accommodating a population of this size in a single location over a prolonged period.

The National Planning Policy Framework emphasises the importance of creating safe and inclusive places where crime, disorder and the fear of crime do not undermine quality of life. Given the substantial size of the proposed resident population and the concentration of that population within a single site, I am not currently assured that crime prevention, security, safeguarding and community safety considerations have been sufficiently addressed through the design, management and operation of the development. Nor am I satisfied that the application adequately demonstrates how increased demands on policing, safeguarding partnerships and other local services would be managed without adverse impacts on the wider community over the lifespan of the proposal.

Transport and Connectivity

I am also concerned that insufficient consideration has been given to the implications for local infrastructure, transport networks, access to services and the ability to integrate the development successfully with the surrounding community.

The proposed site is not located within the centre of an established residential community and the application does not provide sufficient assurance that existing transport links, pedestrian connectivity and access to local services are capable of supporting a resident population of up to 1,256 people. The nature of the proposed development is such that residents will be heavily reliant on local transport infrastructure to access healthcare, support services, employment, education, leisure opportunities and wider community facilities.

In my view, insufficient consideration has been given to the risks associated with accommodating a large population in a relatively self-contained location with limited opportunities for meaningful integration into the surrounding area. Where communities are physically isolated from services and amenities, there is an

increased risk of social isolation, pressure on local services and tensions within both the resident and wider communities. These factors are directly relevant to the creation of safe, inclusive and sustainable places.

Conclusion

My concern is not the principle of providing accommodation for those seeking asylum. Rather, it is whether a development accommodating up to 1,256 residents in a single location for ten years has been sufficiently assessed from a community safety, safeguarding, infrastructure and place-making perspective.

For the reasons set out above, I do not believe the application currently provides sufficient assurance that the impacts on community safety, safeguarding, local infrastructure, transport connectivity and community cohesion have been fully assessed or adequately mitigated.

In particular, I remain concerned about the scale and pace of the proposed change, the concentration of a large resident population in a single location, and the limited evidence demonstrating how the resulting demands on local services and infrastructure would be managed over the lifespan of the development.

I therefore ask that these concerns are given significant weight in the determination of the application and, unless the Secretary of State is satisfied that they can be appropriately addressed, that planning permission is refused



Matthew Barber
PCC for Thames Valley

Christian Bunt
Assistant Chief Constable

Thames Valley Police HQ
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OX5 2NX

[redacted]
www.thamesvalley.police.uk

Date: 18 September 2026

SENT VIA EMAIL

Dear Crown Casework Team

Ref: 26/01833/CROWN; PCU/RARE/C3105/3378843 Location: MOD Bicester (A-site), Bicester Garrison, Launton Road, OX25 1AE.

This letter details Thames Valley Police considerations for the proposed Urgent Crown Development Application for the provision of asylum accommodation at MOD Bicester Site A, which is intended to accommodate up to 1,256 adult male asylum seekers. I am Assistant Chief Constable Christian Bunt, Head of Local Policing for Thames Valley Police. I am also the Chief Officer responsible for the policing response to the proposed asylum centre at MOD Bicester (site A).

Thames Valley Police acknowledge that we are not a statutory authority for the purpose of formally providing representations as part of the planning consultation process. However, as the primary public authority for community safety and the maintenance of law and order, it is incumbent on me to outline key considerations for Thames Valley Police.

Due to the very limited detail in the planning application, it is not possible to conduct a full designing out crime assessment at this stage. My response is therefore limited to some high-level considerations. As more information develops, I will make further representations to the Home Office where necessary and appropriate to do so.

Legislation

The National Planning Policy Framework (NPPF) August 2026

The recently published NPPF places significantly greater emphasis on public safety, security, and crime prevention through design than previous iterations of national planning policy. The NPPF requires development proposals to create safe, secure, and resilient environments and to ensure that crime, disorder, and the fear of crime do not undermine the quality of life of those living, working, and visiting an area.

In particular:

- Paragraph 17(b) seeks to foster "well-designed, beautiful and safe places."
- Policy DP3(2)(f) Public Space requires development proposals to provide spaces that are "safe, secure, inclusive, and accessible" and specifically highlights the importance of lighting, clear and legible routes, and the orientation of buildings to maximise natural surveillance.

- Policy TR4(1)(c) requires streets and routes to help create places that are "safe, inclusive and attractive for all users", particularly those who may be vulnerable to crime or fear of crime.

- Policy P5(1)(a) requires development proposals to identify potential safety and security risks and demonstrate proportionate mitigation measures through the design of the scheme.

- Policy P5(1)(b) requires major developments where large numbers of people are expected to congregate to be informed by police and other relevant stakeholder advice and to take appropriate steps to reduce vulnerability, increase resilience and ensure public safety and security.

Section 17 of the Crime and Disorder Act 1998 places a statutory duty on a range of public authorities, including local planning authorities, to exercise their functions with due regard to the likely effect of their decisions on crime and disorder, anti-social behaviour, substance misuse, and reoffending, and to do all that they reasonably can to prevent these issues. In the planning context, Section 17 requires decision-makers to consider how the design, layout, management, and operation of a development may influence opportunities for crime, fear of crime, disorder, and community safety.

Crime prevention and community safety should therefore form an integral part of the decision-making process rather than being treated as a secondary consideration. It is in this respect that Thames Valley Police is an interested party, discharging our core duties and responsibilities to prevent and detect crime and maintain law and order.

Considerations:

- MOD Bicester Site A is located in a highly rural and isolated environment with limited pedestrian infrastructure, limited public transport accessibility and very few nearby amenities capable of supporting a residential population of up to 1,250 adult males.

- The surrounding settlements of Piddington, Arncott and Ambrosden are all small rural communities with significantly smaller populations than that of the proposed site, containing limited-service provision, few leisure opportunities, and few facilities beyond those required for existing local populations.

- The site's reliance on organised transport and the lack of independent access to amenities, raises questions regarding the suitability of the location for long-term

residential occupation at the scale proposed.

- Careful consideration must be given to the location of proposed accommodation within the site, maximising security, and safeguarding considerations through restricting visibility of occupants and activities from outside the site. Appropriate mitigation measures would therefore be necessary to address privacy, security, and community safety concerns.

- In the short term, my immediate concern is the potential for protest relating to the site. The police have a positive duty to facilitate peaceful protest. Policing nationally has experienced increasing protest activity relating to asylum accommodation, in some cases escalating to serious crime and disorder. Thames Valley Police will be required to plan for a range of potential protest scenarios, all of which will require some level of police resources.

- Community concern has also been heightened by the proposal. This has an impact on how the local community feel about safety and security in their area. Thames Valley Police will be required to provide additional visibility, reassurance and support to the local community, in the form of additional neighbourhood policing.

- There is the potential for significant additional costs for Thames Valley Police which do not currently form part of our budget.

Thames Valley Police will work closely with key partners and stakeholders to discharge our shared responsibilities in relation to community safety, in respect of the site itself and the surrounding local communities.

Yours sincerely



Assistant Chief Constable Christian Bunt
Local Policing
Thames Valley Police

Dear Sir/Madam,

Re: Bicester Site A, Land off B4011, Piddington, UPPER ARNCOTT, Oxfordshire County, OX25 1TW

Waste Comments:
Waste Comments:With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water request that the following condition be added to any planning permission. “No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [redacted] prior to the planning application approval.

The foul water network in this catchment is impacted by high infiltration flows during certain groundwater conditions. Care must be taken when designing new networks to ensure they don’t surcharge and cause flooding. Whilst design and construction guidance for sewers allows for an element of infiltration, we would expect in high risk areas such as this that additional precautions are taken to minimise infiltration; this should be in the form of the installation of leak tight liners within sewers and resin injection to seal chambers. This will help to mitigate the risk of flooding in the vicinity of the development (e.g. reduce property flood risk and travel disruption in the locality) and also help to reduce the risk of pollutions in the wider environment, particularly considering the impact of climate change. In the longer term, Thames Water, along with other partners, are working on a strategy to reduce groundwater entering public sewer networks.

The surface water network in this catchment is impacted by high infiltration flows during certain groundwater conditions. Care must be taken when designing new networks to ensure they don’t surcharge and cause flooding. Whilst design and construction guidance for sewers allows for an element of infiltration, we would expect in high risk areas such as this that additional precautions are taken to minimise infiltration; this should be in the form of the installation of leak tight liners within sewers and resin injection to seal chambers. This will help to mitigate the risk of flooding in the vicinity of the development (e.g. reduce property flood risk and travel disruption in the locality) and also help to reduce the risk of pollutions in the wider environment, particularly considering the impact of climate change. Developers must liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. This must also ensure that the design of any SUDS or surface water management solution conveys exceedance flows away from public sewer networks. In the longer term, Thames Water, along with other partners, are working on a strategy to reduce groundwater entering public sewer networks.

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes:https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution

under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning [redacted] or by emailing [redacted]. Application forms should be completed on line via [redacted] Please refer to the Wholesale; Business customers; Groundwater discharges section.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Water Comments:

Water Comments:Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [redacted]) prior to the planning application approval.

Supplementary Comments:

Thames Water is unable to assess the impact of the proposed development on our foul water network. Please provide a drainage strategy highlighting the proposed point(s) of discharge to the Thames Water network and the proposed discharge method to allow a foul water impact assessment to be conducted.

Yours faithfully,

Development Planning Department

Development Planning,
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Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ,
Email: d[redacted]

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send [redacted]

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Ministry of Housing, Communities and Local Government
Crowncasework@communities.gov.uk

21 September 2026

Dear Sir or Madam

PCU/RARE/C3105/3378843 - Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

Thanks for consulting the NHS Thames Valley Integrated Care Board (ICB). The ICB is set up on 1 April 2026, which was established to plan and oversee health and care services for the 2.5 million people who live in Berkshire, Buckinghamshire and Oxfordshire. Our creation brings together the former NHS Frimley and NHS Buckinghamshire, Oxfordshire and Berkshire West (BOB) Integrated Care Boards into a single organisation with one shared vision for improving health across the Thames Valley. Its role is to look at the needs of local communities, decide what services are needed and work with hospitals, GP practices, community services, councils and voluntary groups to make sure people get high quality, joined up care.

Primary healthcare estates including GP premises are funded through reimbursement of rents and business rates by the ICB based on the existing population data. The rent will then be assessed by the District Valuer, given that the ICB will reimburse that rent. The ICB therefore has a responsibility to ensure that any primary care provision is financially affordable and operationally viable. The ICB however has no dedicated funding for any primary care estates development in their annual budgets.

National Planning Policy Framework (NPPF)

Paragraph 17 of the NPPF sets out that the planning system should ensure public service infrastructure can reflect the current and future needs and supports communities' health and wellbeing. Policy DM1 sets out that proposals for major development should be informed by early engagement with infrastructure providers, to 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.

Policy HC3 sets out that proposals for housing development which would give rise to significant numbers of additional people living in should be informed by an understanding of the need for any associated improvements to public service infrastructure, whether on or off-site; and provide for new or improved public service infrastructure which are necessary for the development to be acceptable in planning terms, whether by direct provision or a contribution to off-site improvements. Planning conditions and obligations should be used to secure the timely delivery of public service infrastructure required to serve new development, so that these facilities are available for use when the development is first occupied or comes into use.

Policy HC4 sets out that substantial weight should be given to the benefits where new or improved public service infrastructure would be provided. Local planning authorities, developers and public service providers should collaborate in a positive and proactive manner to identify and resolve key planning issues before applications for community facilities and public services infrastructure are submitted.

Funding towards primary care

The ICB has no dedicated funding for any primary care estates development in their annual budgets. The financial contribution will go towards capital costs of primary healthcare provision resulting from an increase in population and additional demand on healthcare facilitates.

GP Practice Capacity

Primary Care Network	Practice	Registered Patients	Gross Internal Area (GIA)	GIA Standard (sqm)	GIA surplus / deficit
Bicester	Alchester Medical Group: Victoria House Surgery	21,772	670	1,250	deficit
	Alchester Medical Group: Langford Medical Practice		546.7		
	Bicester Health Centre	15,858	1,018.8	1,083	deficit
	Montgomery House Surgery	16,981	1,099.1	1,167	deficit

While there is no national guidance in setting out the capacity of a GP practice, NHS England widely accepts “size and space standards”, which set out the appropriate size of GP premises (gross internal area (GIA), square metres) in relation to the number of patients to be accommodated at the premises. The table above clearly shows that none of the GP Practices, which serves the development, have sufficient clinical capacity to accommodate any new patients from the development. Primary care mitigation is therefore required in this regard.

Primary Care Estates Project

The ICB is currently in discussions with Practices in Bicester and the contributions can go towards one of the projects to generate additional clinical capacity. It bears emphasis that all projects set out below are specific and costed, which relate directly to the development on the site.

Practice	Project Details	Cost Estimate
Alchester Medical Group: Victoria House Surgery	Reconfiguration/front extension of the existing premise	TBC

Alchester Medical Group: Langford Medical Practice	Refurbishment/reconfiguration of the existing space to create a single additional clinical room	~£0.5M
Bicester Health Centre	Reconfiguration of the former OH space, removal of the existing Julier centre reception area (by reconfiguring exiting reception area) and allowing OH to share existing reception area with the Practice	TBC
Montgomery House Surgery	Extension/Reconfiguration of an existing premise to create additional clinical rooms	TBC

The requested contribution will be based on the patient yield generated from the proposed development and therefore the requested contribution would be proportionate to the quantum of the proposed development. The Section 106 Planning Obligation would identify and secure the delivery of the identified project.

Section 106 Planning Obligation

The ICB requests the contribution needs to be index-linked. The ICB is therefore seeking a developer contribution of £483,279. The contribution would need to be made prior to any formal commencement of the development to ensure the delivery of the identified project. This is in line with the NPPF that planning obligations should be used to secure the timely delivery of public service infrastructure required to serve new development. The ICB would also like to request some flexibility in terms of allocating the developer contributions so that the contributions can be reallocated to other identified projects in the local area to serve the development if the identified project is not operationally and financially viable.

Relevant Appeal Decisions

The ICB would like to draw the Council's attention to an appeal decision at the land to the North of the A4, New Bath Road, Twyford in Wokingham Borough. Paragraph 51 of the appeal decision relates to a healthcare contribution request from the ICB. The Inspector agreed that the request would meet the necessary test as the ICB has demonstrated that the existing Twyford Surgery is over capacity and requires additional clinical space to be able to accommodate any new patients from the proposed development. This would be achieved through either the reconfiguration of existing non-clinical space or an extension to the premises. The contribution has been calculated based on the number of dwellings proposed which has been used to define an additional patient yield.

The ICB has a recent appeal decision at the land adjacent to Blagrove Lane, Wokingham in Wokingham Borough. Paragraph 70 of the appeal decision relates to a healthcare contribution request from the ICB. The Inspector agreed that the request would meet the necessary test and has had regard to the approaches adopted by the Inspector in the New Bath Road appeal.

The ICB also has an appeal decision at land at Churchway, Haddenham in Buckinghamshire. Paragraphs 19 to 22 of the appeal decision relate to a health contribution request from the ICB. The Inspector accepted the ICB confirmation that there is no capital funding budget for primary care infrastructure development. The Inspector also took into account an appeal decision at Warwickshire but confirmed that this did not apply as the appeal at Haddenham identifies the contribution for an identified primary care estates project including the commissioning of a pre-

project study and an identified project which can be funded in one of two ways depending on the pre-project study; either a reconfiguration of the internal layout or an expansion to provide an additional clinical space at the centre to increase capacity.

Summary and Conclusion

In an absence of this financial contribution, none of the GP practices in the local area would have the capacity to accommodate any new patients from the development. This is contrary to the NPPF, which new development should support wellbeing and provide necessary infrastructure. Therefore, the requested contribution is necessary to make the development acceptable in planning terms and is directly related to the development. Furthermore, the financial contribution is calculated based on projected population increase of the proposed development (i.e., patient yield). Therefore, it is fairly and reasonably related in scale and kind to the development. The ICB would like to raise an objection to the proposed application unless the requested contribution is secured via a planning obligation.

It is noted that Urgent Crown Development applications do not have an exemption from developer contributions if the financial contribution fully complies with Section 122 of the Community Infrastructure Levy Regulations 2010 (as amended). It is also noted that asylum seekers are allowed to register with an NHS GP surgery.

Please contact us if you have any questions relating to this letter.

Yours sincerely,

[redacted]

Jeffrey Ng MRTPI
Lead for Primary Care, Infrastructure / Estates Planning
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NHS Thames Valley