[redacted]

From: Crown Casework

Subject: FW: PCU/RARE/C3105/3378843

Attachments: 2026-09-11 Prime Minister Letter MOD Bicester.pdf

From: MILLER, Calum (MP) <calum.miller.mp@parliament.uk>
Sent: 17 September 2026 21:15
To: Crown Casework <crowncasework@communities.gov.uk>
Cc: wpwsobjection@gmail.com; MILLER, Calum (MP) <calum.miller.mp@parliament.uk>
Subject: PCU/RARE/C3105/3378843

You don't often get email from calum.miller.mp@parliament.uk. Learn why this is important

Dear Crown Casework Team,

I am writing in response to the current consultation on the Urgent Crown Development application for MOD Bicester (Site A) in my constituency.

I have previously set out my deep concerns about this proposal in correspondence to the Prime Minister, following his commitment to look into the matter. Those remain my concerns, and I am submitting the attached correspondence, together with its annex, as my formal representation on planning application PCU/RARE/C3105/3378843. The annex sets out the concerns I have identified as material planning considerations, and I would ask the Secretary of State to consider them carefully in determining the application.

The matters identified in the attached correspondence include concerns regarding the adequacy of the proposed drainage and electricity arrangements, flood risk, ecological impacts, transport and accessibility, infrastructure capacity, the completeness and reliability of the submitted evidence, and the deliverability and value for money of the proposal.

Since writing to the Prime Minister, I have also met with representatives of Piddington Parish Council, Arncott Parish Council, Ambrosden Parish Council, Blackthorn Parish Council, Bicester Town Council, Cherwell District Council, Oxfordshire County Council and the local community, and have considered the representations made by these

councils and other local bodies. I endorse the objections and concerns raised by those organisations and would ask the Secretary of State to consider them alongside my own representation.

I would ask that these matters be taken into account in determining the application. In particular, I would ask the Secretary of State to consider whether the information currently submitted is sufficient to enable a properly informed planning judgement, how the proposal should be considered against the development plan and other relevant planning policies, and whether matters which remain fundamental to the feasibility and deliverability of the development can appropriately be left to be resolved after permission is granted.

I believe it is particularly material that Cherwell District Council - as the local planning authority - identified such material gaps in the application from the Home Office. I attended the meeting of Cherwell's planning authority on 16 September and understand that Cherwell District Council's (CDC) Principal Planning Officer has raised significant concerns about the completeness of the information submitted by the Home Office, including that the environmental screening assessment lacked critical information. He went as far as to state that he considered that the application would not have been sufficiently complete for validation had it been submitted to CDC through the normal planning process. I would ask the Secretary of State to consider carefully whether the information currently before her is sufficient to enable a properly informed planning decision.

The Minister for Border Security and Asylum indicated to me on 14 September that she expected any conditions attached to the planning decision to be enforced by the Local Planning Authority (CDC). I would ask the Secretary of State to confirm this, and clarify that CDC would have the necessary role and powers to enforce any such conditions.

I also attended the meeting of Bicester Town Council on 16 September, at which I was made aware of concerns regarding the adequacy of the ecological information submitted with the application, including widely available information on protected species recorded in the area. In particular, there are nearly 6,000 reports of protected species in the area of the site, including great crested newts and twelve species of bat. This suggests that the information provided in the application is wholly inadequate and might lead to unlawful activity at the site that fails to protect wildlife. Given the number of outstanding ecological surveys already identified in my earlier correspondence, I would ask the Secretary of State

to consider whether the ecological information currently submitted is sufficient to enable the potential impacts on protected species and habitats to be properly assessed before any decision is taken.

I also understand that Bicester Countryside and Communities CIC has issued a pre-action letter in relation to a proposed judicial review, identifying gaps in the justification for the environmental screening decision made on 26 August. I strongly support the concerns raised in that correspondence and trust that the Department will consider carefully the points raised within it, which are fundamental to the lawfulness of the application.

Oxfordshire County Council has raised concerns regarding public health, safeguarding, welfare provision and the potential impact on local services. These include questions around disease prevention and outbreak management arrangements, mental health support for residents, and the extent to which the implications for local public services have been identified, funded and mitigated. I would ask the Secretary of State to give careful consideration to these concerns in determining the application.

I remain deeply concerned about whether the accelerated Urgent Crown Development procedure is justified given the number of material matters which remain unresolved. I have repeatedly raised my concern that the urgent requirements were not met. The MOD confirmed that it had first been approached by the Home Office in November 2025. The application makes clear that some of the consultants asked to produce reports were commissioned in April 2026. The Housing Minister, Rt Hon Matthew Pennycook MP, informed me that an urgent Crown Development application had been agreed on 16 July. Yet the application was not published until 2 September. In short, the Government did not proceed with urgency yet expected consultees to respond within 10 days. I asked ministers to extend this deadline to 21 days but they refused.

I would be grateful if this correspondence and annex could therefore be treated as my formal representation and considered alongside the other representations and consultation responses received in relation to the application.

Yours sincerely,

Calum Miller

Calum Miller MP

Member of Parliament for Bicester and Woodstock

Liberal Democrat Spokesperson for Foreign Affairs

Office telephone: [redacted]

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CALUM MILLER MP

HOUSE OF COMMONS
LONDON SW1A 0AA

The Rt Hon Andy Burnham MP
Prime Minister and First Lord of the Treasury
10 Downing Street
London
SW1A 2AA

11 September 2026

Proposed asylum accommodation centre at MOD Bicester

Dear Andy,

Thank you for responding on 1 September to my question about the Government's proposal to house 1,250 male asylum seekers in a remote location at MOD Bicester, close to the small villages of Piddington, Arncott, Blackthorn and Ambrosden.

You said you would look at all the material and report back from the Despatch Box, when you had reviewed the case. Since that would be unprecedented, I asked the Leader of the House yesterday how this would happen and was pleased to have his assurance that you would share your views with me and my constituents.

Since our exchange, the Home Office's application was finally published on 2 September, and runs to hundreds of pages. Whilst I welcome receiving the information that was promised, I remain deeply concerned by both the quality of the proposal and the evidence underpinning it.

I appreciate how busy you are. So I wanted to provide you with a summary of the key issues with this proposal ahead to help you as you formulate your views on it.

A previous plan to house asylum seekers at MOD Bicester was proposed by a Labour Government in 2003, but rejected by a planning inspector who concluded that the site was isolated, unsafe and unsuitable. Today, more than 20 years later, the same conditions that made the previous proposal untenable remain.

It is very important to stress a number of key facts about this site.

A. **It is not a current MOD accommodation site.** It is a semi-derelict storage depot that has been used over years for military equipment. There are no unused former barracks or military accommodation blocks that can be repurposed.
B. **This site is adjacent to small villages without amenities.** The nearest is Piddington with a population of 370 and no shop, no pub and no bus service. Two miles away is Arncott which is home to a number of service personnel families within its population of around 1,500 and a single one-stop shop.

Liberal Democrat MP for Bicester and Woodstock
calum.miler.mp@parliament.uk

C. **There are no utilities or facilities at the site.** To provide even a basic level of accommodation will require huge capital investment to bring in power and water. There will be nothing for those living at the camp to do. They will have high voltage power lines above them and asbestos-ridden derelict warehouses next to them. If they want to leave the site, there is no safe route along the B4011 – a road on which there have been two deaths in the last three years near to the proposed site.
D. **The wider Bicester area faces severe power and water shortages.** North West Bicester should by now have over 9,000 new homes as part of the Garden Town project. These have been held up for years by a lack of Grid connections. Just this week, I have been told a new development cannot open as Thames Water cannot supply it with water. Opening this site will directly impede the Government's goal to provide more housing in the area.
E. **Creating new facilities at this site will be very expensive and is unlikely to represent good value for money for the taxpayer.**

The application from the Home Office lays bare these problems and provides no compelling solutions. There are a number of fundamental issues that, in my view, make it impossible to conclude that this application is ready for a lawful decision. I have set these out in the attached note.

Taken together, these are not minor issues that can simply be addressed at a later stage. I believe that Ministry of Housing, Communities and Local Government would not be able to make a lawful decision on this application and that the only responsible course of action is for the application to be withdrawn.

My constituents deserve to be presented with a complete and properly considered proposal, supported by accurate evidence and capable of being lawfully determined. The current proposal achieves none of those things.

If you are not willing to withdraw the application at this stage, I would implore you to instruct Ministers to allow constituents and statutory consultees significantly more time to consider it. Normal planning applications, and non-urgent Crown Development Orders, provide a minimum 21-day representation period for statutory consultees and the public. That period exists for a reason; it allows interested parties to properly review the evidence and formulate informed representations. It is therefore wholly unreasonable that a development of this scale and importance has been given a consultation period of only 10 days, less than half the established period.

In your speech at No10 North on 24 July, you promised that politics would be done differently; that you would listen to people and that more power would be placed in the hands of those who know their communities best. This is an opportunity to demonstrate that you meant that.

I therefore urge you to withdraw the application. If you will not do so now, then I request that, at the very least, you extend the consultation period and ensure that the outstanding concerns are properly addressed before any decision is taken.

Yours sincerely,

[redacted]

Calum Miller MP

Liberal Democrat MP for Bicester and Woodstock
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ANNEX: Detailed Comments

The documents published on 2 September which constitute the Home Office's application for the asylum centre demonstrate a number of fundamental issues that make it impossible to conclude that this application is ready for a lawful decision.

1) There is still no confirmed long-term foul drainage solution for the facility. The application states that tankering, which is proposed during the first phase of the development, would not be viable at full occupancy. Yet no alternative long-term solution is proposed. It is difficult to understand how a development of this scale can properly proceed when a basic requirement for its operation remains unresolved.

2) The site's electricity supply is unresolved. The application concedes that the existing electrical infrastructure cannot be relied upon and that temporary and/or permanent generators will therefore be required. Yet the potential noise and emissions impacts of those generators do not appear to have been assessed anywhere in the application.

3) The location raises serious flood-risk concerns. The first phase of the proposed plan, to accommodate 408 asylum seekers, is proposed on one of the lowest and most flood-prone parts of the site. The Government's own documents show that 25% of the site has a 'high chance' of surface water flooding. Piddington Brook, a tributary to the River Ray, is only a few meters away from the edge of the MOD Bicester site.

4) There are significant unresolved environmental concerns. Natural England has advised that a hydrological connection between the application site and the nearby Arncott Bridge Meadows Site of Special Scientific Interest cannot be ruled out. Importantly, its previous advice was based on assumptions about the site's drainage arrangements that differ significantly from the drainage solution subsequently advanced in the application documents.

5) The site has inadequate pedestrian, cycling and public transport infrastructure. The Home Office confirms that there is currently no pedestrian or cycle infrastructure around the site and that nearby bus stops cannot be safely reached on foot. The application itself acknowledges that neither site entrance is currently served by pedestrian infrastructure. The Home Office describes the location as having "very limited facilities" and suggests that this is acceptable because the development would operate as a largely self-contained site. This is effectively an acknowledgement of the site's unsuitability, especially when the Home Office states that the residents of the site will be free to leave.

6) Nine ecological surveys are still outstanding. These include surveys for bats and great crested newts. Both require surveys to be undertaken within defined seasonal windows, which I understand have now passed if the Government intends to proceed with the development in 2026. It is therefore unclear how the environmental impacts of the proposal can properly be assessed on the current timetable.

7) I am concerned about the accuracy and quality of the information submitted. My constituents were greatly alarmed to see that the 'preliminary risk assessment for potential unexploded ordnance contamination' refers to 3,510 asylum seekers, rather than the 1,256 stated elsewhere in the proposal. I understand the Government's explanation is that 3,510 is an old figure and that the site is intended to accommodate 1,256 people. However, given the scale and significance of this development, the Government must provide confidence

that the information underpinning the application is accurate and up to date. An error of this magnitude inevitably raises concerns about whether other information within the application may also be inaccurate or out of date.

8) There is a fundamental question of value for money. 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. Any proposal must demonstrate clear value for money for the taxpayer. Given the significant investment that will be required to make MOD Bicester operational, I do not believe that this has yet been demonstrated.

Sarah Pochin MP
Member of Parliament for Runcorn & Helsby
HOUSE OF COMMONS
London SW1A 0AA

Thursday 17th September 2026

Crown Development Casework Team
Ministry of Housing, Communities and Local Government
Planning Casework Unit
23 Stephenson Street
Birmingham
B2 4BH

Our Ref: 20260917_SP_AC_01

RE: Urgent Crown Development Application – MOD Bicester Site A
MHCLG Ref: PCU/RARE/C3105/3378843 | Cherwell District Council Ref: 26/01833/CROWN

Dear Sir or Madam,

I write to object to the above application for the temporary change of use and redevelopment of MOD Bicester Site A to provide non-detained asylum accommodation for up to 1,256 service users.

My objection is based upon material planning considerations concerning the suitability of the site and, importantly, whether sufficient information has been provided to enable a properly informed planning decision to be made.

I note the detailed assessment undertaken by the professional planning officers at Cherwell District Council. The concerns identified by the Local Planning Authority reinforce my view that permission should not be granted on the evidence currently available.

1. Insufficient information to determine a full planning application

My principal concern is that the application seeks full planning permission for a substantial development accommodating up to 1,256 people, yet fundamental details of the proposed development remain unresolved or have not been provided.

Cherwell District Council's planning officers have identified significant deficiencies in the information submitted. In particular, the application does not provide a proposed detailed site layout, floor plans, elevations, sections, levels, detailed landscaping and lighting plans or a detailed access and servicing layout.

This is not a minor technical issue. Without sufficiently detailed plans, it is difficult properly to assess matters including the development's design and layout, landscape impact, lighting, servicing arrangements, accessibility and environmental effects.

There also appear to be material inconsistencies within the application documentation, including differing figures for the site area and floorspace. Furthermore, the parameters plan allows development of up to 12 metres in height across part of the site, whereas other environmental and landscape assessments appear to have proceeded on the basis of buildings of no more than approximately six metres.

For a full planning application of this scale and significance, the decision-maker should be satisfied as to what is actually proposed and its likely impacts before permission is granted.

I therefore share the concern expressed by Cherwell District Council that the application should not be determined favourably without the necessary information being provided and properly assessed.

2. Unsustainable location, accessibility and highway safety

I am concerned about the suitability of this relatively isolated rural location for a residential population of up to 1,256 people.

Residents accommodated at the site would be non-detained and would therefore need safe and practical access to services and facilities beyond the site. While some facilities would be provided on site, residents would inevitably need access to shops and other everyday services and amenities. The surrounding rural area does not provide the range of facilities that would ordinarily support a residential population of this scale.

Private car ownership amongst residents cannot reasonably be assumed as the means by which those services would be accessed. Significant numbers of residents are therefore likely to be reliant upon walking, cycling, public transport or transport specifically provided by the operator. This raises an important question as to whether existing rural public transport could accommodate the substantial additional demand generated by the development, and, if not, whether sufficient additional transport provision can realistically and reliably be maintained for the duration of the proposed use.

These concerns are compounded by the existing transport environment. The site is poorly connected by pedestrian and cycling infrastructure and is accessed from the B4011. Thames Valley Police's Designing Out Crime Officer has described the site as highly rural and isolated, with no suitable pedestrian or cycle connections. The B4011 adjacent to the site is an unlit 50mph road, while collision data considered during the planning process includes serious and fatal collisions.

A development accommodating up to 1,256 residents, together with approximately 130 staff and the associated servicing, deliveries and other movements, therefore requires particularly robust evidence that the substantial additional travel demand can be accommodated safely and sustainably.

Dedicated shuttle transport may form part of the proposed mitigation, but reliance upon such provision does not remove the underlying accessibility constraints of the location, nor the need to demonstrate that residents can safely and practically access ordinary day-to-day services and amenities.

I therefore consider that significant concerns remain as to whether this is a sustainable and appropriately accessible location for a residential use of this scale and intensity, particularly in relation to public transport capacity, pedestrian and cycling connectivity and highway safety.

3. Ecology and adequacy of environmental evidence

I am concerned by the issues identified by Cherwell District Council's professional ecology officers concerning the ecological evidence accompanying the application.

The Council's assessment identifies apparent omissions from the ecological records search, including records of great crested newts within 200 metres of the site and badger within 500 metres, together with records of notable butterfly species.

The Council's ecologists have consequently identified a requirement for further survey work in relation to species including great crested newts, breeding birds, reptiles, hazel dormouse, barn owl and terrestrial invertebrates.

I do not suggest that the existence of these records establishes that any particular protected species is currently present within the development footprint. However, where the professional ecological advice identifies potentially significant gaps in the evidence base and considers further surveys necessary, those matters should

be resolved before a decision to grant full planning permission is made.

This is particularly important given the demolition, construction, artificial lighting, infrastructure and substantial increase in human activity associated with the proposed development.

4. Infrastructure and environmental capacity

The proposed development would introduce a substantial residential population and associated staff into the site and consequently requires significant infrastructure for water supply, wastewater treatment, drainage, electricity, waste, transport and other services.

The application itself includes a new wastewater treatment plant and substantial associated infrastructure.

I note that important consultees and infrastructure providers have not yet provided all of the information necessary to establish conclusively whether these arrangements are acceptable.

I therefore support the Local Planning Authority's position that the application should not be determined before the relevant responses and technical evidence have been received and properly considered.

Conclusion

I recognise that the provision of asylum accommodation and the Government's desire to reduce reliance upon hotel accommodation are matters to which the decision-maker may attach weight.

However, those considerations do not remove the requirement for a development of this scale to be demonstrated to be acceptable in planning terms.

The question before the Secretary of State is not simply whether there is a national requirement for accommodation. It is whether this development, at this particular location, on the information presently available, represents an acceptable use of the site.

The deficiencies identified in the submitted information, concerns regarding the site's accessibility and highway safety, unresolved ecological matters and outstanding questions concerning infrastructure mean that I do not consider that this has presently been demonstrated.

I therefore object to the application and respectfully request that planning permission is not granted on the evidence currently before the Secretary of State.

Yours faithfully,

[redacted]

Sarah Pochin MP
Member of Parliament for Runcorn and Helsby

GREG SMITH MP
Member of Parliament for Mid Buckinghamshire

HOUSE OF COMMONS
LONDON SW1A 0AA

14 SEPTEMBER 2026

FORMAL OBJECTION TO URGENT CROWN DEVELOPMENT APPLICATION

MOD Bicester Site A, near Ploughley Road, Arncott, Bicester, Oxfordshire
MHCLG reference: PCU/RARE/C3105/3378843
Cherwell reference: 26/01833/CROWN

To Whom It May Concern,

I wish to register my **formal objection** to the proposed temporary change of use of MOD Bicester Site A to provide non-detained asylum accommodation for up to 1,256 single adult males. I ask that this representation be considered in full as part of the planning process and that the matters set out below be treated as material planning considerations.

My objection to this application is not directed towards those people seeking asylum, but rather my concerns of the impact this development for up to 1,256 people will have on the surrounding rural communities and the existing inadequate road and pedestrian infrastructure. As well as, and more specifically, concerns relating to the location, scale, accessibility, infrastructure, environmental impact, utilities, security, safety and more.

Site Location

This isolated rural location cannot possibly be considered sustainable, given the proposed occupancy levels of up to 1,256 single adult males. Whilst those who are interned in the facility would be able to come and go as they please the reality of the site's seclusion, with no direct public transport links, lack of public footways or cycleways and several kilometres from the nearest medium sized town (Bicester), it has to be assumed that those resident in the Camp will have limited options for outside travel or activities and be largely confined to the facility. With such a huge gathering of confined single male adults this, it would seem to me, could become a recipe for unrest, a fact tacitly acknowledged in the MoD report which refers to the management of potential on-site protests.

Whilst the proposal contains vague statements on the provision of on-site facilities such as dining facilities, a laundry service and recreational facilities which, apart from lacking in any real detail, clearly indicates that outside access to shops and other services off-site will be required. There is a vague commitment to provide a dedicated bus service, but again there is a complete lack of detail and of course this would come at a huge cost if it were to run for upwards of 10 years.

telephone: [redacted] email: **greg.smith.mp@parliament.uk** web: **www.gregsmith.co.uk**

Sited in this isolated location without any existing transport services and lacking in public footways it is difficult to see how the facility could ever be deemed either practical or sustainable.

Specific Highways Matters

Local highways infrastructure in this rural area is not of a standard to cope with a development housing such a sizable population, where inter village roads and lanes are often narrow and mostly without footways or street lighting. This is to be expected amongst small village communities, but the introduction of what in essence would be a development with a population dwarfing that of the existing nearby villages is an entirely different matter.

The applicant's own Transport Assessment identifies the B4011 as a rural road without footways or street lighting around the northern site access, with limited pedestrian and cycle accessibility and that walking is not recommended for local trips.

If, as seems highly likely, residents of the facility wish to leave the site and do not have access to organised transport they will have little alternative to walking along narrow country lanes, lacking in footways or lighting. **This is a pedestrian safety issue that cannot be ignored**.

Regarding staff and service traffic to and from the Site, yet again there is scant detail provided largely due to large sections having been redacted in the Traffic Assessment.

One can hardly claim genuine consultation whilst this application in almost every section lacks real detail. If the applicant cannot provide adequate detail then the application should be withdrawn until such time as that information is available.

On-site Infrastructure

This is an absolutely critical issue. A development housing upwards of some 1,256 people plus staff numbers, service providers and visitors would require substantial investment.

Provision of the following require serious and careful consideration:

Clean water
Electricity
Gas
Telecommunications
Surface water drainage
Foul water drainage

Clean water

It would appear that the current mains water supply would need upgrading and that this is still in the design stage. This is being based on an assumption that the potable water will be supplemented via a storage tank system to provide resilience of supply.

I ask with all sincerity, how on earth can a planning application be put forward (validated) when adequate water supply is uncertain and a solution to this is still in the design stage?

Electricity

The report states - "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".

So, uncertain power supply, reliance on generators, noise implications and yet more expense to factor into the capital costs for this misguided project.

Gas

No gas supply.

Telecommunications

New telecommunication connections will be required for the site.

Surface water drainage

Applicant's report outlines an indicative SUDS- based surface water strategy, which then goes on to say "The strategy allows phased implementation aligned with development. However, it 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."

So basically, a strategy based on sheer guesswork! This cannot be taken seriously.

Foul water drainage

The Applicant's report illustrates a shocking lack of information on the most basic service provision i.e. foul water drainage.

The report states "...the design process has been constrained by the absence of key site-specific information." "...no details of the existing Waste Water Treatment Works or associated EA permits have been made available." "...surveys required to locate and verify the presence of existing on-site sewers and drains have not been completed."

Because all of this information is outstanding the report even considers whether a Discharge to Watercourse permit will be required and if so will need to establish an outfall location.

I cannot be strident enough in my opposition to any foul water discharge into local watercourses. This must not be allowed to become part of the design process of this development. It is NOT acceptable.

Ecological concerns

I have serious concerns over the potential impact of this development on the ecology of what has become a semi-rewilded site. A site that is most likely home to foraging bat species, barn owls, breeding birds, grazing deer and other local wildlife. Further ecological studies are required.

With the River Ray near to the site I am particularly worried about pollution from the foul water that will be generated from the development, and also from construction materials and other waste.
The development would inevitably impact the current biodiversity existing on site. Environmental and landscape issues should be considered for the cumulative impacts on:

- Landscape character
- Lighting
- Noise
- Traffic
- Water
- Drainage
- Biodiversity
- The surrounding rural environmental

Impact on Local Communities and pressure on emergency services

Given the isolated location of this site and the collection of small communities in the surrounding countryside it is perfectly reasonable and understandable that there is widespread concern throughout villages in the broader area. With a facility of upwards of 1,256 male asylum seekers "kicking their heels" villagers have genuine safety concerns that their rural way of life will become afflicted with issues more akin to inner city deprivation areas.

These villages and hamlets are often without facilities such as shops etc, and this could lead to groups of individuals hanging out on the streets with nothing to do, inevitably leading to feelings of intimidation and a safe guarding risk for local children.

The local policing structure is already under pressure and simply could not cope with such a massive increase in the local population. Likewise the ambulance service is also under severe pressure, as are GP surgeries. Sufficient funding would need to be assigned to expanding these services to cope with the extra demand created by this large scale development.

Cost Analysis of public funds expenditure

Whilst technically not usually a planning matter, nonetheless this is not a usual planning application but is being fast tracked through the Urgent Crown Development procedure and it is important that a thorough cost analysis is conducted before any decision to proceed.

In the absence of any such analysis from the applicant the following costings provided by the campaign group Wrong Plan Wrong Site (WPWS) pose serious questions about the funding for this project.

WRONG PLAN WRONG SITE

MOD BICESTER SITE A

Illustrative Cost Report

5-year and 10-year scenarios | September 2026

IMPORTANT

The figures in this report are campaign modelling, not a published Home Office forecast for MOD Bicester Site A. They are designed to test the financial assumptions and identify the evidence Government should publish.

1. Executive Summary

This report tests the potential whole-life economics of MOD Bicester Site A using a consistent set of illustrative assumptions. The central issue is not simply the headline capital cost: the value-for-money result depends heavily on how long the site remains operational, how fully it is occupied, what is included in the operating benchmark, and whether additional Site A-specific infrastructure costs arise.

Measure	5-year scenario	10-year scenario	Hotel comparator
Capacity assumption	1,256	1,256	-
Operating benchmark	£135/place/night	£135/place/night	£144/person/night
Operating cost	£308.0m	£615.9m	-
Illustrative capital	£230.0m	£230.0m	-
Total modelled cost	£538.0m	£845.9m	-
Equivalent cost/place/night	£235.34	£185.17	£144.00
Difference vs £144	+£91.34	+£41.17	-
% above £144	+63.4%	+28.6%	-

On these assumptions, shortening the operating period from ten years to five years raises the effective capital charge per place/night from about £50.17 to £100.34. The modelled total therefore rises from £185.17 to £235.34 per place/night.

KEY VALUE-FOR-MONEY QUESTION

What operating life has the Home Office assumed for Site A, what is the break-even point against alternative accommodation, and what is the taxpayer exposure if the site closes earlier than planned?

2. Core Assumptions

Capacity: 1,256 places.

Occupancy: 100% occupancy throughout the modelled period. This is a favourable assumption for spreading fixed capital costs.

Operating benchmark: £135 per place per night, using the Wethersfield operating benchmark currently used by the campaign. The exact parliamentary source and cost scope should be verified before external publication.

Hotel comparator: £144 per person per night, using the Government hotel benchmark supplied for this comparison.

Capital scenario: £230 million illustrative Site A capital model. This is not a Home Office Site A estimate.

Asset life: The full £230 million is allocated across either five or ten operating years. No residual value is credited at the end of the period.

Additional risks: Potential Site A-specific costs are shown separately unless it is clear they are not already contained within the £135 operating benchmark, to avoid double counting.

3. Illustrative £230m Capital Cost Scenario

The campaign's current capital model is an illustrative build-out scenario intended to test the scale of potential investment. It should be presented as a modelling assumption and challenged against the Government's own costed business case.

Capital component	Illustrative £m
Accommodation blocks	£75m
Dining halls/commercial kitchens	£10m
Medical/health centre	£4m
Administration/Home Office	£6m
Interview/legal facilities	£3m
Recreation/gym/communal	£8m
Laundry/housekeeping	£3m
Stores/deliveries/waste	£3m

Internal roads/parking	£10m
Water supply/distribution	£5m
Electricity/substation/distribution	£8m
Sewage/drainage/wastewater treatment	£12m
Fire-water/fire protection	£5m
Security fencing/gates/barriers	£5m
CCTV/access/security systems	£5m
External lighting	£2m
Landscaping/external works	£3m
Communications/data	£2m
Surveys/planning/design/professional fees	£15m
Construction preliminaries/site establishment	£7m
Contingency	£19m
TOTAL ILLUSTRATIVE CAPITAL	**£230m**

4. Five-Year vs Ten-Year Cost Model

At 1,256 places, an operating benchmark of £135 per night produces an annual operating cost of approximately £61.89 million. The difference between the five- and ten-year scenarios is therefore driven primarily by the period over which the £230 million capital investment is spread.

Cost calculation	5 years	10 years
Operating cost	£309.45m	£618.89m
Capital cost	£230.00m	£230.00m
Total modelled cost	£539.45m	£848.89m
Capital cost/place/night	£100.34	£50.17
Operating cost/place/night	£135.00	£135.00
Total cost/place/night	£235.34	£185.17
Difference vs £144 hotel	+£91.34	+£41.17
Percentage above £144	+63.4%	+28.6%

5. Early Closure and Stranded-Investment Risk

A major capital programme carries a stranded-investment risk if the policy, demand profile or future Government approach changes before the assumed operating life is reached. It would not be accurate to state that a change of Government in 2029 automatically means Site A will close; a future

Government could continue, modify or end the policy. The relevant financial question is therefore whether the investment remains value for money under shorter operating-life scenarios.

For illustration, if the same £230 million capital assumption were spread across only three years at 1,256 places and the £135 operating benchmark remained unchanged, the capital element would be about £167.23 per place/night and the combined model would be about £302.23 per place/night.

STRANDED-CAPITAL TEST

Government should disclose the assumed minimum operating life, residual asset value, break-even point, sensitivity analysis and taxpayer exposure if Site A closes earlier than forecast.

6. Site A-Specific Cost Risks Not Yet Safely Added

The following issues may create additional costs, but they should not simply be added to the core model until the scope of the £135 operating benchmark is confirmed. Doing so could double count utilities or other operating expenditure.

Risk	Current position	Cost treatment
Electricity/generators	Generator provision is assumed in the utilities evidence because existing electrical capacity has not been verified.	Potential fuel exposure modelled separately at c. £3.92m-£7.11m/year; check whether included in £135.
Wastewater/tankering	Nearest WwTW capacity is not definitively confirmed; Phase 1 tankering is identified as a fallback that does not scale to full capacity.	Acceptance charge benchmark alone is c. £1,283/day during Phase 1; haulage and other costs are additional/unquantified.
Permanent wastewater solution	Municipal connection or on-site treatment solution remains unresolved in the campaign evidence.	Unknown.
Grid reinforcement	Long-term electricity solution and reinforcement requirements remain to be established.	Unknown.
Contamination/asbestos/UXO	Potential site remediation risks require evidence and cost confirmation.	Unknown.
Highways/transport	Additional service, tanker and fuel-delivery movements may have cost and infrastructure implications.	Unknown.
Environmental mitigation	Drainage, noise, air quality and ecological mitigation may create capital and operating costs.	Unknown.

7. Questions Government Should Answer

- What is the total approved capital budget for MOD Bicester Site A?
- What annual operating cost and cost per occupied place/night has been assumed?
- What operating life has been used in the business case: five years, ten years, or another period?

- What is the break-even point against hotel accommodation and dispersal accommodation?
- What occupancy rate has been assumed, and how sensitive is the value-for-money result to lower occupancy?
- What residual value has been attributed to the site and its infrastructure if the asylum use ends early?
- What is the taxpayer exposure if policy changes or the site closes before the assumed break-even date?
- Which electricity, generator, fuel, wastewater, tankering, transport, remediation and environmental costs are included in the business case?
- Has a Green Book-compliant options appraisal compared Site A with hotels, dispersal accommodation and alternative sites?
- Will the Home Office publish the full business case, sensitivity analysis and whole-life cost model?

8. Conclusion

The campaign's illustrative modelling indicates that the economics of Site A are highly sensitive to operating life. On the current assumptions, a five-year scenario is approximately £539.45 million in total and £235.34 per place/night; a ten-year scenario is approximately £848.89 million and £185.17 per place/night. Both exceed the £144 hotel comparator used in this report.

These figures should not be represented as Government forecasts. Their purpose is to demonstrate why the missing assumptions matter. A credible value-for-money case requires Government to publish the capital budget, operating cost, occupancy assumption, intended operating life, residual value, break-even analysis, sensitivity tests and treatment of Site A-specific infrastructure risks.

CAMPAIGN POSITION

If Government believes our illustrative scenario is wrong, publish the Site A business case and show taxpayers the real number.

Evidence Note

The sewage tankering evidence reviewed for this report records that the applicant's Drainage Design Statement says definitive information on the capacity of the nearest wastewater treatment works is not yet available, identifies tankering as a possible Phase 1 fallback, and states that tankering is not viable for the total number of service users at full capacity. The same report estimates Phase 1 treatment-works acceptance charges at approximately £1,283 per day using a published external tariff benchmark, excluding haulage and several other costs.

Generator and wastewater figures are therefore treated as cost risks rather than automatically added to the core £135 operating benchmark.

Appendix

RAF Weathersfield

If the government started with a largely empty MOD site **and had to construct the accommodation and supporting facilities from scratch?"**, the answer is considerably higher than the £49m refurbishment figure.

The NAO says Wethersfield was originally expected to cost £5m to set up, but this rose to £49m; the Home Office was using existing buildings plus modular accommodation, with utilities and other infrastructure proving much more expensive than anticipated.

A reasonable 2026 estimate

For a 1,250-person site broadly providing the functionality of Wethersfield, but requiring the accommodation and facilities to be newly constructed, I would provisionally estimate:

Component	Indicative cost
Accommodation buildings	£70m–£100m
Dining/kitchen facilities	£8m–£12m
Medical/health facilities	£3m–£5m
Administration/interview/legal facilities	£5m–£8m
Recreation/gym/sports/community facilities	£8m–£12m
Laundry, stores, waste facilities etc.	£3m–£5m
Roads, parking, footways and landscaping	£8m–£12m
Electricity, water, drainage, sewage and utilities	£15m–£25m
Security fencing, gates, CCTV and security infrastructure	£8m–£12m
Fire systems/emergency infrastructure	£5m–£8m
Design, planning, surveys, professional fees	£12m–£18m
Contingency/risk	£15m–£25m
Indicative total	£160m–£242m

Estimations – AI model from historical cost models : There is some useful independent evidence behind this scale of estimate. Current UK modular procurement frameworks cover permanent residential modular construction and include the associated design, engineering and site works. A 2025 UK student-accommodation benchmark puts the average operational bed at around £100,000, while noting that this is below the cost of actually building new stock.

Why this matters for MOD Bicester

There is therefore a potentially useful evidence chain:

Site	Cost figure reported	Source/basis
Linton-on-Ouse	£423.29–£527.81 per person/night	Local campaigners' calculation using NAO/Scampton cost data
Linton-on-Ouse	£403.4m total	Campaigners' projection
Crowborough	~£160 per person/night	Home Office figures reported in press
Wethersfield	~£133–£135 per person/night	Home Office figures reported in national press
Barnham	Millions in site works	Recent reporting; no equivalent published per-person calculation found yet
MOD Bicester	No comparable published site-specific per-person figure found yet	—

Conclusion

Given all of the reasons listed above, the ridiculous lack of firm detail and widespread redactions in the applicants planning application, and what would appear to be a vastly uneconomical expenditure of public funds it is doubtful that it should even have been validated.

For all of the above reasons I request that this application be **REFUSED.**

[redacted]

GREG SMITH MP
MID BUCKINGHAMSHIRE