Secretary of State

MHCLG

23 Stephenson Street

Birmingham

B2 4BH

Bicester Countryside and Communities C.I.C.

[redacted]

Reg.co. No. 17399471

15th September 2026

Dear Secretary of State

Re: Objection to Planning Application PCU/RARE/C3105/3378843
Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

I am writing to you on behalf of the Directors of Bicester Countryside and Communities C.I.C. to object to the above urgent planning application in respect of accommodation for 1,256 asylum seekers at the above site.

We are concerned that the evidence submitted with the application is incomplete and inaccurate. Insufficient research has been done by the applicant on a number of grounds and the environmental impact has not been sufficiently considered. This relates in particular to the presence of protected species, including several species of bats and great crested newts.

The site has never had residential accommodation. There is concern about contamination of the ground, given its former use; no investigation into this has been carried out by the applicant. Of concern also is the amount of surface water, with the site given to flooding in wet periods, without sufficient drainage. The proposed accommodation units would be hugely affected by this. The plans for collecting and removing effluent from the proposed centre have not been fully considered, given the proximity of planned accommodation and the capacity required for this.

There is currently no possibility of utility connections to the site. The application has not demonstrated how the required infrastructure will be provided, especially in the short timescale proposed. The cost to the public purse of installation, if feasible, would be considerable.

Being in a rural location, near a small village, there is no effective public transport; a bus comes daily to nearby HMP Bullingdon but this would not enable travel to and from a local town. Services for the public are under pressure. The site is located on the busy B4011; no traffic surveys have been carried out by the applicant, although local traffic researchers express concern at the amount of traffic passing at speeds on the road, which has no pedestrian infrastructure or, of course, any street lighting. The applicant's Transport Assessment refers to the wrong road.

No consideration has, of course, been given in the application to the effect on the local population. There has been a great deal of local concern, especially given the lack of any facilities within miles of the site.

Insufficient time has been given for public consultation, let alone for accurate and up to date research on the site. Most residents will not be able to access or have time to trawl through the supporting documents, even if they were complete and accurate.

It is concerning that even the application itself has the wrong address; although we have used this at the head of this letter, being the 'official' designation, the site is not located in Launton Road. This error is symptomatic of a rushed application, which has not been thought through sufficiently.

In short, we respectfully ask that the above Planning Application be refused on the grounds that the site and location are wholly unsuitable.

In the event that the Secretary of State approves the application, we request that adequate research, consultation and investigation are undertaken into the issues of environment, infrastructure, condition of the site, utilities, transport and welfare of any residents. In addition, we ask that issues of security, pedestrian access, noise and lighting are given adequate consideration.

Yours sincerely

Signed on behalf of the Directors,
by Dr Jane Clements MBE, Administrator
Bicester Countryside and Communities C.I.C.

From: Crown Casework
To: [redacted]
Subject: FW: PCU/RARE/C3105/3378843 - Bicester Visiosn
Date: 24 September 2026 17:59:16
Attachments: image001.jpg
image002.png
image003.jpg
image004.png
image005.png
image006.png

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[redacted]
Head of Crown Casework
Ministry of Housing, Communities & Local Government
Chief Planners Directorate
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From: Bicester Vision [redacted]k>
Sent: 15 September 2026 17:54
To: Crown Casework <crowncasework@communities.gov.uk>
Cc: calum.miller.mp@parliament.uk
Subject: PCU/RARE/C3105/3378843

> You don't often get email from [redacted]. Learn why this is important

Dear Secretary of State,

Bicester Vision is the business partnership for Bicester and the surrounding area. We bring together employers, public bodies and community organisations to support the town's growth, and we work closely with Cherwell District Council and Oxfordshire County Council on economic matters. We write to set out the views of the local business community on this application, so that they can be given weight in your decision regarding whether or not to permit the development of Bicester Site A into asylum accommodation.

Bicester is not simply a growing town. It is a nationally significant economic hub, home to major UK businesses and to one of the country's leading visitor destinations and employers, bringing investment, jobs and international spending into the UK economy. Without the infrastructure and investment needed to support its continued growth, that contribution could be constrained, with negative consequences for jobs, business confidence, visitor spending and the wider economy.

Between 4 and 11 September 2026 we surveyed local businesses, organisations and residents for their views regarding the proposals. Responses were received from a range of businesses which included but are not limited to sole traders to employers with more than 250 staff, across retail, construction and property, manufacturing, logistics, professional services, health and social care, education and the voluntary sector. The full results are available on request.

Strength of feeling

Every respondent opposes the proposal, and 88% strongly oppose it. Nobody is neutral, and nobody is in favour. Every respondent also feels that businesses have not been properly informed or consulted, two thirds of them not at all. The representation period is very short for a scheme of this scale and duration, and we ask you to take that into account when weighing the volume of local representations against the time available to make them.

Key concerns

The survey found near-unanimous concern about the wider impact on Bicester:

- 96% expect a negative effect on how Bicester is perceived as a place to do business and attract investment
- 96% expect a negative effect on the safety and security of staff, customers and premises
- 92% expect a negative effect on property values and rental demand
- 88% expect a negative effect on local infrastructure and public services
- 83% expect a negative effect on their own business or organisation over the next two years
- 71% expect a negative effect on local roads and transport

The site-specific objections raised most often in written responses are these. The site has no water, power, sewerage or residential accommodation of its own, so everything would need to be built from scratch, in an area where utility capacity is already constraining planned housing. There is no safe pedestrian access, and the roads to the site have no footpaths. Up to 1,256 people would be placed on a single isolated site near a small town for up to ten years, which is a different proposition from dispersed accommodation. And businesses question whether the economic case, value for money and impact on the local economy have been assessed at all. The safety and security concern is reported here as a matter of business confidence and premises security, which is how respondents raised it.

The view of the business community is that this is the wrong plan on the wrong site. As one respondent put it, that is not opposition to asylum seekers: "My concern is specifically about the suitability and scale of this particular site."

Our request

We ask that the application be refused. If you are minded to approve it, no decision should be taken until full evidence on infrastructure, transport, ground conditions, cost and economic impact has been provided and independently assessed, and until mitigation for local businesses has been secured by condition and funded before occupation.

Bicester Vision would welcome the opportunity to engage with your officials and the Home Office on behalf of local businesses.

Yours sincerely

Lynn Pratt

Chair

Bicester Vision C.I.C.





From: Crown Casework
To: [redacted]
Subject: FW: Objection to planning application PCU/RARE/C3105/3378843, Site A, MOD Bicester - church
Date: 24 September 2026 17:48:42
Attachments: image001.png

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[redacted]
Head of Crown Casework
Ministry of Housing, Communities & Local Government
Chief Planners Directorate
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From: Jocelyn Bennett [redacted]k>
Sent: 16 September 2026 15:49
To: Crown Casework <crowncasework@communities.gov.uk>
Cc: calum.miller.mp@parliament.uk; [redacted]
Subject: Objection to planning application PCU/RARE/C3105/3378843, Site A, MOD Bicester

> You don't often get email from [redacted]. Learn why this is important

Dear Secretary of State,

I am writing to you in my capacity as Methodist Minister in Bicester, and on behalf of the Bicester Methodist Church, to object to the planning application PCU/RARE/C3105/3378843, the proposed 1,256 person asylum accommodation centre at Site A, MOD Bicester Garrison, Launton Road, Oxfordshire OX25 1AE.

I ask that the planning permission be refused.

The Methodist Church is committed to being a justice-seeking church, standing up for people seeking asylum and those discriminated against. We are a church that stands up for the rights of the poor, the dispossessed, migrants and those seeking a safe place to live. We stand against the abuse of power and leadership in our country and across the world. We stand on behalf of those seeking asylum in Britain who deserve the best accommodation we can offer. Which is not this proposed site.

There is nothing safe in the proposal to build accommodation on Site A. It is the wrong place because of its former use, its lack of utilities, its location and transport links. The site is a former fuel depot with diesel in underground tanks; ground contamination has not been investigated using bore hole drilling. The site has no connection to a water supply or to the sewerage system, it regularly floods with surface water a concern. Drains in the local area are already at capacity. The site has no electrical or gas supply. There has been little or no investigation into the basic safety of the site as a place for people to live.

There is evidence in the planning application paperwork that public transport, ecology, infrastructure and other fundamental matters have been given scant attention. That the site is served by a busy B Road with no pavements is just one example of a total disregard to the welfare of the people that the Home Office propose to house in this accommodation.

When the proposal was first made by the Home Office there was no opportunity for the public to have a voice in this planning proposal. Even with this planning application which has come after intervention by our MP, there is not sufficient time within the proposal period, for local residents and all interest parties, to be able to respond with any depth of knowledge and understanding. Not because this does not exist, but because the application documents run to over 1,000 pages of complicated technical details, and it is not reasonable to expect them to be properly read and considered within the given 10 day time frame. If this were an ordinary planning application there would be a 21 day planning period. The standard Crown Development route also has a 21 day planning period. It is not just and fair that this proposal has been reduced to 10 days.

My church congregation were involved in the previous planning application proposal, to build a smaller accommodation development on this site. That proposal was refused by the independent planning inspectors and the proposal cancelled. In the intervening years the site has further deteriorated and there is no evidence that it now is suitable.

We ask that the planning permission be refused.

And we ask that if the Secretary of State decides that this proposal should go ahead; that no decision be made until all work concerning drainage, flooding, sewerage, waste water, land contamination, ecology, transport, public safety, highways, pedestrian safety, electricity supply, lighting, noise, fire safety and the comprehensive decommissioning of a former WW2 fuel depot, has been completed and independently verified.

Yours faithfully,

Rev'd Jocelyn Bennett
Bicester Methodist Church, Sheep Street, Bicester
OX26 6JQ

From: Crown Casework
To: [redacted]
[redacted] FW: Comment on your application reference PCU/RARE/C3105/3378843 PORTFUTURES UK CORRIDOR OBSERVATORY REPRESENTATIONS ON URGENT CROWN DEVELOPMENT APPLICATION - observetory
Date: 24 September 2026 17:50:57
Attachments: image001.png

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[redacted]
Head of Crown Casework
Ministry of Housing, Communities & Local Government
Chief Planners Directorate
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From: [redacted]>
Sent: 16 September 2026 13:11
To: Crown Casework <crowncasework@communities.gov.uk>
Subject: Comment on your application reference PCU/RARE/C3105/3378843 PORTFUTURES UK CORRIDOR OBSERVATORY REPRESENTATIONS ON URGENT CROWN DEVELOPMENT APPLICATION

You don't often get email from [redacted]. Learn why this is important

Dear Sir or Madam,

Please find below representations from the Portfutures UK Corridor Observatory concerning the proposed development at MOD Bicester Site A.

We recognise entirely the pressures facing the Crown and accept that there may be a genuine national requirement to secure suitable asylum accommodation quickly. Our representations are not directed at asylum policy or at the people requiring accommodation. They address whether the physical development, supporting infrastructure and local consequences have been adequately evidenced.

There is, however, a wider question of fairness and consistency.

Commercial infrastructure developers face equally pressing national problems: freight congestion, constrained ports, inadequate rail capacity, energy requirements, housing delivery and failing supply-chain resilience. Yet projects capable of addressing those problems can spend years—and sometimes decades—passing through planning, consultation and approval processes. They must establish transport capacity, drainage, utility connections, environmental mitigation and commercial deliverability before being permitted to proceed.

The Crown has created an accelerated route for its own urgent requirements. That may be understandable, but it must not become a **two-tier planning system** in which public urgency permits unresolved matters to be deferred while commercial applicants remain subject to the full weight and duration of due process.

The principle should be simple: the timetable may be accelerated, but the evidential standard should not be reduced.

Our review identifies several matters which remain unquantified or dependent upon future confirmation—notably shuttle-bus demand, foul-water capacity, wastewater tankering, drainage sequencing, healthcare provision and the controls governing a nominally temporary use that may continue beyond ten years.

We offer these observations constructively. Portfutures has spent more than four decades working with transport, logistics and strategic-development projects globally. Through the UK Corridor Observatory, we are testing a method of examining major decisions against independently verifiable evidence rather than institutional assurance alone.

We appreciate the very compressed timetable under which officials are working and would be pleased to clarify any part of our analysis. We would also welcome correction where the published record contains information we may have interpreted incorrectly.

Good planning should accommodate urgency. It should not allow urgency to replace proof.

Kind regards,

Oliver Roper
Portfutures International Corridors Ltd
Portfutures UK Corridor Observatory

Preserving economies with independently verifiable truth

Application: MOD Bicester Site A
MHCLG reference: PCU/RARE/C3105/3378843
Cherwell District Council reference: 26/01833/CROWN
Applicant: Home Office
Proposal: Accommodation for up to 1,256 non-detained asylum seekers
Representation submitted by: Portfutures International Corridors Ltd
Date: 17 September 2026

1. Introduction

Portfutures International Corridors Ltd submits these representations through the Portfutures UK Corridor Observatory.

Portfutures is a British infrastructure and corridor-development company. Its team has more than 40 years' experience examining the relationship between strategic development, transport capacity, utilities, land use and local, national and regional economies.

The UK Corridor Observatory is being established to provide independently verifiable analysis of important infrastructure and planning decisions. Its purpose is not to advocate for or against any political position, but to test whether the evidence before a decision-maker is sufficiently complete, consistent and reliable to support the decision being requested.

These representations are therefore confined to material planning considerations. They express no view on national asylum policy or on the individuals who may be accommodated at the site.

2. Executive conclusion

The application seeks permission for a substantial new residential institution comprising:

- up to 1,256 non-detained adult male residents;
- approximately 130 staff;
- 600 modular accommodation units;
- 147 car-parking spaces;
- healthcare, catering, welfare and recreational facilities;
- new drainage, wastewater, energy and security infrastructure; and
- an intended operational life of at least ten years, with provision for operation beyond that period.

The disclosed evidence contains significant unresolved dependencies. These concern:

1. the completeness of the transport assessment;
2. the absence of quantified shuttle-bus movements;
3. the sustainability and accessibility of the rural location;
4. foul-water capacity and reliance upon tankering;

5. surface-water management and the sequencing of drainage infrastructure;
6. the effects on protected ecological receptors;
7. the practical meaning of a “temporary” ten-year permission designed to operate for longer;
8. healthcare and public-service capacity;
9. contamination, asbestos and unexploded-ordnance risk;
10. monitoring, enforcement and responsibility for mitigation; and
11. the compressed opportunity for local scrutiny under the Urgent Crown procedure.

These are not peripheral details. They concern whether the development can operate safely and sustainably without exporting material costs, risks or capacity requirements to surrounding communities and infrastructure.

Portfutures respectfully submits that planning permission should not be granted until these dependencies have been resolved through verified evidence.

If the Secretary of State is nevertheless minded to grant permission, occupation should be prevented until binding plans covering transport, foul water, drainage, ecology, healthcare, emergency services, community liaison and eventual decommissioning have been approved.

3. The Urgent Crown procedure does not displace planning merits

The Government’s policy requires Urgent Crown development to be both nationally important and genuinely required as a matter of urgency. It also confirms that Crown applications remain subject to determination on their planning merits, with due consideration given to national and local planning policy.

Urgency may justify an accelerated process. It does not convert an unresolved infrastructure dependency into an acceptable planning impact.

The abbreviated procedure makes it more—not less—important that the Secretary of State distinguishes between:

- matters established by evidence;
- matters inferred from comparable sites;
- matters promised for subsequent design stages;
- matters dependent upon third-party agreement; and
- matters that have not yet been quantified.

A rapid decision should not create a position in which the principle and scale of development have been approved before the infrastructure required to support that development has been demonstrated to be deliverable.

4. Scale, duration and reversibility

The description of the proposal as “temporary” requires careful qualification.

The application documents indicate that:

- the initial operational period would be ten years;
- the facilities are being designed to operate for longer;
- continuation beyond ten years may be permitted following review;
- no definitive decommissioning programme has been provided; and
- the EIA screening material assumes permanent operation as a worst-case scenario.

A ten-year institutional use accommodating 1,256 people is capable of producing enduring infrastructure, environmental and community effects. “Temporary” should not be treated as meaning short-lived, readily reversible or inherently low-impact.

Any permission should therefore include:

- an absolute cessation date;
- no extension without a fresh planning application;
- a fully costed decommissioning and restoration plan;
- an enforceable timetable for removing modular buildings and infrastructure;

an independently secured restoration bond or equivalent financial mechanism; and
- baseline surveys against which restoration can be verified.

A review after ten years is not equivalent to an enforceable requirement to cease the use.

5. Transport evidence is materially incomplete

5.1 Known operational movements

The applicant's own written statement identifies approximately:

- 260 staff vehicle movements per day;
- 192 service-vehicle movements per day;
- two minibus movements associated with arrivals; and
- up to 30 taxi movements per day.

That produces approximately 484 disclosed daily vehicle movements before any shuttle-bus movements are added.

The number, routing, timing and capacity of shuttle buses have not been quantified, notwithstanding that the proposal relies upon those services to provide access to off-site facilities and reduce local effects.

The total operational transport demand has therefore not been established.

5.2 No pre-application highway scoping

The Transport Assessment records that, because of the expedited process, no pre-application scoping discussions were held with the local planning or highway authorities before it was prepared.

This is important. For a development of this scale, local highway knowledge should inform:

- assessment junctions;
- traffic-distribution assumptions;
- construction routes;
- pedestrian and cycling conditions;
- cumulative development scenarios;
- seasonal and abnormal traffic conditions;
- emergency access; and
- monitoring requirements.

The lack of prior scoping increases the need for independent scrutiny by Oxfordshire County Council before determination.

5.3 Rural accessibility

The Transport Assessment acknowledges that:

- the site is in a rural location;
- no significant facilities are available within a two-kilometre walk;
- the site is poorly placed for ordinary public-transport access; and
- residents will depend substantially upon facilities provided on-site or organised transport.

Residents will nevertheless be non-detained and free to leave on foot. The real pedestrian desire lines, destinations and frequency of trips therefore need to be assessed rather than assumed away through the description of the site as "self-sufficient".

The application should demonstrate safe routes between the site and Piddington, Arncott, Ambrosden, Bicester and relevant public-transport stops. Particular attention should be given to road speeds, lighting, footway continuity, crossing points and conflict with heavy vehicles.

5.4 Inconsistency requiring clarification

The application documents appear to refer variously to the principal access road as the B4011 and the B1104.

The correct road designation, survey locations and modelled access points should be confirmed before reliance is placed on the transport conclusions.

5.5 Required transport information

Before determination, the applicant should provide:

- a complete multimodal trip budget;
- the assumed number and timetable of shuttle buses;
- proposed shuttle destinations and routes;
- confirmation of whether wastewater tankers are included in service-vehicle totals;
- construction traffic volumes and routing;
- cumulative assessment with committed local development;
- pedestrian and cycling safety audits;
- emergency-access testing;
- an assessment verified by Oxfordshire County Council; and
- enforceable thresholds triggering additional transport mitigation.

The application should not be approved on the assumption that unspecified future operational management will remedy an incomplete transport case.

6. Foul-water disposal remains unresolved

The application acknowledges that it has not yet been confirmed whether the existing sewer network has sufficient capacity to receive foul water from the development.

Interim tankering is proposed, potentially involving transfer to Bicester Wastewater Treatment Works. However, acceptance and treatment capacity at that facility remain subject to confirmation.

This creates several unanswered questions:

- How much foul effluent will be generated each day at each phase?
- How many tanker movements will be required?
- Are those movements included in the Transport Assessment?
- What storage capacity will exist during disruption, bad weather or contractor failure?
- What happens if Bicester Wastewater Treatment Works cannot accept the material?
- Which alternative licensed facilities have been identified?
- What are the routes and hours of tanker operation?
- What spill-response arrangements will protect nearby watercourses and designated ecological sites?
- At what point will a permanent solution replace tankering?

A development accommodating 1,256 people should not be occupied before a deliverable foul-water solution and confirmed receiving capacity are secured.

Natural England’s acceptance that a properly controlled tankering operation need not damage the SSSI is not the same as proof that the complete operational system, receiving capacity and vehicle requirement have been secured.

No phase should be occupied until the Environment Agency, Thames Water and the relevant drainage authority have confirmed the final arrangements in writing.

7. Surface water and sequencing

The application identifies areas of surface-water flood risk and proposes attenuation tanks, pumping and other drainage infrastructure.

However, elements of the principal attenuation infrastructure are described as part of Phase 3. This raises a fundamental sequencing question: what drainage system will protect residents, neighbouring land and ecological receptors during Phases 1 and 2?

Permission should require all strategic drainage infrastructure needed to serve any occupied phase to be completed and operational before that phase is occupied.

The final design should demonstrate:

- safety throughout the development's full potential lifetime;
- allowance for climate change;
- no increase in flood risk elsewhere;
- safe access and escape;
- water-quality treatment;
- emergency storage during pump or power failure;
- maintenance responsibility and funding; and
- monitoring of discharge quality and quantity.

These details should not be deferred if they affect the fundamental feasibility of the proposed scale of occupation.

8. Ecology and water environment

The site lies close to sensitive ecological receptors, including Arncott Bridge Meadows SSSI and Piddington Wood ancient woodland, and within a Drinking Water Safeguard Zone.

The application relies upon mitigation, final drainage design, operational procedures and regulatory controls to exclude significant effects.

Where multiple safeguards are necessary, the Secretary of State should identify:

- the responsible party for each measure;
- when each measure must be delivered;
- the performance standard to be achieved;
- how compliance will be monitored;
- who receives monitoring results;
- the corrective action required if a threshold is exceeded; and
- whether occupation must reduce or cease following a material failure.

Mitigation should be secured through precise conditions rather than general assurances that details will be agreed later.

9. Ground conditions, asbestos and unexploded ordnance

The application site has a long history of military occupation. The published evidence refers to asbestos-containing materials, possible contamination and unexploded-ordnance risk.

Given that the proposal would introduce a large resident population, adequate intrusive investigation and remediation must precede occupation.

The Secretary of State should require:

- intrusive contamination surveys;
- asbestos surveys and removal plans;
- unexploded-ordnance risk mitigation;
- soil and groundwater testing;
- validation reports following remediation;
- controls on construction dust and contaminated runoff; and
- independent confirmation that each occupied area is suitable for residential-institutional use.

These are matters affecting the suitability of the land for its proposed users, not merely construction-management details.

10. Healthcare and public services

The applicant proposes an on-site medical centre with eight consulting rooms and states that routine and primary care requirements will principally be met on-site.

The documents nevertheless acknowledge potential demand on emergency and external healthcare services. They also refer to external GP capacity, including Unity Health at Brill.

Before permission is granted, the Secretary of State should require current written evidence from relevant healthcare bodies confirming:

- which services will be provided on-site;
- operating hours and clinical staffing;
- responsibility for commissioning and funding;
- arrangements outside operating hours;
- ambulance and emergency demand;
- mental-health provision;
- infectious-disease and isolation arrangements;
- access to dentistry, pharmacy and secondary care; and
- whether nearby practices and hospitals possess sufficient capacity.

A statement that a practice was accepting patients at a particular date is not a durable capacity agreement for a ten-year development.

Equivalent operational consultation should be demonstrated with Thames Valley Police, the fire and rescue service, ambulance service, local public-health bodies and other affected authorities.

11. Relationship with surrounding communities

Piddington is identified as approximately 250 metres from the application site. Its proximity means that it could experience effects associated with:

- pedestrian movements;
- traffic and servicing;
- lighting;
- noise;
- landscape change;
- emergency incidents;
- protest activity;
- pressure on facilities; and
- public concern resulting from inadequate information.

These matters must be handled objectively and without stigmatising future residents.

A formal community liaison structure should be established before construction begins. It should include Piddington Parish Council, other affected parishes, Cherwell District Council, Oxfordshire County Council, emergency services, the Home Office and the site operator.

It should publish verified information on:

- occupancy levels;
- transport movements;
- complaints and response times;
- environmental monitoring;
- incidents affecting neighbouring communities;
- performance against planning conditions; and
- corrective measures.

The operator has not yet been appointed. Responsibility for compliance must remain enforceable against the Crown applicant and must not depend solely upon the performance of a future contractor.

12. Alternatives and scale

The Urgent Crown process establishes an asserted need for accelerated determination. It does not remove the need to demonstrate why the proposed site and maximum scale represent an acceptable planning solution.

The evidence should explain:

- why 1,256 bedspaces are required at this particular site;
- whether a smaller first phase would meet the immediate urgent requirement;

- what alternative Crown sites were assessed;
- how environmental and infrastructure constraints were compared;
- whether the development can operate safely at each intermediate phase; and
- what objective evidence would justify progression from one phase to the next.

A phased application should be accompanied by phased decision gates. Approval of the maximum capacity should not automatically follow from evidence showing only that an initial 408-person phase may be manageable.

13. Environmental Impact Assessment

The Secretary of State has directed that the proposal is not EIA development.

Portfutures does not suggest that the direction can simply be disregarded. However, the screening material itself records several matters whose final form remains uncertain, including foul-water management, aspects of drainage, operational transport and duration.

The planning decision should therefore explain clearly how cumulative effects have been assessed where important operational inputs remain unconfirmed.

If the scheme, infrastructure solution, phasing, capacity or operational assumptions change materially after permission, the need for further environmental screening should be reconsidered before those changes are authorised.

14. Requested decision

Portfutures respectfully requests that the Secretary of State either:

A. Withhold or defer permission

Permission should be withheld or determination deferred until the applicant has supplied, and relevant technical bodies have reviewed:

1. a complete transport and shuttle-bus assessment;
2. a verified foul-water strategy with confirmed receiving capacity;
3. a fully sequenced surface-water drainage scheme;
4. final ecological mitigation and monitoring;
5. intrusive contamination, asbestos and UXO investigations;
6. secured healthcare and emergency-service arrangements;
7. a phase-by-phase infrastructure-capacity assessment;
8. a community liaison and transparency protocol; and
9. an enforceable decommissioning and restoration plan.

B. Alternatively, impose strict controls

If permission is granted, it should include conditions providing that:

- no phase may be occupied until its transport, wastewater, drainage, healthcare, ecological and emergency-service requirements are operational;
- maximum occupancy is controlled separately for each phase;
- progression between phases requires written approval based on monitored performance;
- wastewater tankering cannot commence without confirmed receiving capacity and an approved routing and spill-response plan;
- strategic drainage must precede occupation;
- shuttle buses must operate to an approved service specification;
- residents must be provided with safe and dignified access to necessary off-site services;
- transport and environmental performance must be independently monitored and published;
- complaints and incidents must be reported through a transparent liaison process;
- the use must cease on a fixed date unless fresh permission is granted;
- all structures and infrastructure must then be removed and the site restored; and
- responsibility for compliance remains with the applicant irrespective of any operating contractor.

15. Final observation

The central planning question is not whether the national requirement is important. It is whether this particular development, at this scale, in this location, can be shown to operate safely and sustainably for its full potential lifetime.

At present, several of the systems upon which that conclusion depends remain unquantified, unconfirmed or deferred to later design and operational stages.

The Urgent Crown route permits speed. It does not require the Secretary of State to substitute assumption for evidence.

Portfutures therefore asks that the application be determined only upon independently verifiable evidence and that no community, public authority or environmental receptor be left carrying an infrastructure risk that the application has not fully identified, funded and controlled.

Submitted by:

Oliver Roper

Portfutures International Corridors Ltd

Portfutures UK Corridor Observatory

Preserving economies with independently verifiable truth

LIONCOURT
HOMES

MHCLG Birmingham Office
23 Stephenson Street
Birmingham
B2 4BH

17th September 2026

Dear Sirs

Ref: PCU/RARE/C3105/3378843: Temporary Change of Use of the former defence storage and distribution centre site (MOD Bicester A – Site)

This representation is submitted on behalf of **Lioncourt Homes Limited** in relation to the above planning application.

Whilst Lioncourt Homes recognises the need to provide accommodation for Service Users and appreciates the urgency associated with the proposals, we have a number of concerns regarding matters that do not appear to have been fully addressed within the submitted documentation.

The proposed development seeks to utilise existing vacant MOD accommodation alongside new temporary buildings to provide accommodation for up to 1,256 Service Users. The proposals would deliver a self-contained facility incorporating sleeping accommodation, catering, healthcare and recreational facilities.

Our principal concern relates to ecology and the deliverability of the proposed scheme. The application is not supported by sufficiently up-to-date survey information to fully assess the ecological implications of the proposed demolitions and site works. In particular, several buildings have been identified as having bat roost potential, whilst the site is also located within the NatureSpace Red Zone. The Preliminary Ecological Appraisal acknowledges that further survey work is required; however, many ecological surveys are seasonally constrained and the process of securing the necessary European Protected Species and NatureSpace licences can be lengthy.

Given these requirements, it is unclear whether the ecological constraints can be addressed within the timescales anticipated by the applicant. Until the necessary surveys have been completed and any licensing requirements resolved, development cannot lawfully proceed. This raises concerns regarding the deliverability of the accommodation and whether the urgent need identified by the applicant can realistically be met.

[redacted]
info@lioncourthomes.com
www.lioncourthomes.com

Lioncourt Homes Ltd., Suite 2, Brook Court,
Whittington Road, Worcester, WR5 2RX

We note that foul drainage capacity is an existing constraint within the local area. However, it is acknowledged that the application identifies a number of potential drainage solutions which may be capable of overcoming network limitations should a connection to the existing mains infrastructure prove unfeasible.

We also have concerns regarding the appearance and longevity of the proposed modular accommodation blocks. Whilst the use of modular construction may be justified given the temporary nature of the proposal, the application seeks consent for a period of ten years. Given the scale of the development and the likelihood that demand for this type of accommodation may continue beyond the proposed timeframe, it is important that the buildings achieve a satisfactory standard of design and appearance appropriate to their potentially long-term presence on the site.

Finally, the National Planning Policy Framework has been updated since the submission of the application. It is important that the application is reviewed against the most up-to-date national planning policy framework to ensure that the proposed development is assessed consistently with current Government policy and that the most appropriate form of development is ultimately delivered.

We trust these comments will be taken into consideration during the determination of the application.

Yours faithfully,

[redacted]

Rachael Bibby

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