[redacted]

From: [redacted]
Sent: 03 September 2026 12:55
To: Crown Casework
Cc: Calum Miller MP
Subject: FORMAL OBJECTION & ALTERNATIVE SITE PROPOSAL – MOD Bicester Site A – PCU/RARE/C3105/3378843
Attachments: island_asylum_reception_processing_proposal.pdf

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I am writing to register my formal objection to the proposed use of MOD Bicester Site A for asylum accommodation for up to 1,256 service users.

MHCLG reference: PCU/RARE/C3105/3378843
Cherwell reference: 26/01833/CROWN

I have reviewed the published application documents in detail.

My concern is not simply that I do not want this development in Bicester. The submitted evidence raises serious questions about whether this particular site is suitable, whether fundamental infrastructure issues have been resolved before permission is sought, and whether Government has adequately considered lower-impact alternatives.

I have therefore attached a separate policy proposal setting out an alternative model which I believe Government should formally assess before committing substantial public expenditure to MOD Bicester.

1. Foul drainage and wastewater remain unresolved

The submitted Drainage Design Statement is concept-stage and identifies further work required to establish technical feasibility.

A final foul-water solution has not been demonstrated. The application consequently makes provision for an on-site wastewater treatment works if an appropriate connection cannot be achieved.

That alternative would itself require detailed design, an acceptable discharge location and relevant Environment Agency permitting.

For a development accommodating up to 1,256 people, a proven foul-water solution should be fundamental to demonstrating that the site is suitable.

I ask MHCLG to establish before determination:

- where foul water would ultimately be discharged;
- whether sufficient network capacity exists;
- whether the Environment Agency accepts the proposed solution;
- and whether all necessary infrastructure is demonstrably deliverable.

2. Potential wastewater treatment works – odour and noise

The applicant's own drainage documentation identifies further odour assessment and potential mitigation associated with the wastewater-treatment option.

Permission should not proceed on the assumption that such infrastructure can operate acceptably until the necessary assessment has demonstrated that it can.

3. Utility capacity has not been established

The Utilities and Infrastructure Assessment acknowledges that existing utility capacities remain to be determined and makes provision for temporary solutions.

For a continuously occupied development of this size, Government should demonstrate adequate permanent potable-water, electricity, wastewater and other essential infrastructure before occupation.

The applicant should also explain exactly what the proposed "temporary solutions" could comprise and for how long they might operate.

4. Pedestrian accessibility and transport

The Transport Assessment acknowledges the site's poor accessibility by sustainable modes while also confirming that residents will be free to come and go.

Managed minibus transport does not remove the foreseeable possibility of residents independently leaving the site on foot.

Safe independent pedestrian access should therefore be demonstrated rather than assuming residents will use Government-organised transport.

5. Surface-water flooding and drainage

The submitted assessments identify existing surface-water constraints and recommend additional investigation and modelling.

The final drainage strategy should demonstrate that the development can accommodate existing and future climate-change flood risk without transferring additional risk elsewhere.

Fundamental questions concerning downstream capacity and final outfalls should not remain unresolved.

6. Ecology

The Preliminary Ecological Appraisal acknowledges limitations associated with its survey scope and timing and recommends further targeted surveys for protected species.

Those surveys should be completed and properly considered before development proceeds where they are necessary to understand potentially significant effects.

7. Healthcare and pressure upon existing services

The proposal relies heavily upon the site being relatively self-contained and providing healthcare facilities.

Providing physical space for healthcare is not the same as demonstrating a funded, commissioned and adequately staffed healthcare service.

Before determination, Government should provide evidence covering clinical staffing, operating hours, GP provision, pharmacy, dentistry, mental-health provision, ambulance demand, hospital requirements and arrangements with relevant NHS bodies.

Any assertion that the development will have limited impact upon existing healthcare provision should be

supported by evidence.

8. Transport assumptions

Parts of the Transport Assessment rely upon operational data from RAF Wethersfield.

Comparable-site evidence can be useful, but the applicant should demonstrate that appropriate allowances have been made for the considerable differences between Wethersfield and Bicester in geography, neighbouring settlements, staffing arrangements and transport accessibility.

The assessment should also properly consider cumulative development and population growth around Bicester.

9. The supposedly temporary nature of the proposal

The application seeks temporary permission for ten years.

However, supporting documentation indicates that facilities are being designed so that they could operate beyond ten years if required.

If permission were granted, it should contain an unequivocal and enforceable cessation and restoration condition.

Any continuation beyond the authorised period should require a fresh planning assessment rather than becoming an assumed extension of the present development.

10. Too many fundamental matters remain deferred

I accept that planning conditions routinely deal with detailed design.

However, there is a significant distinction between matters of detail and evidence necessary to establish whether a development of this scale is suitable and deliverable at this particular location.

The combination of unresolved foul drainage, utility capacity, surface-water management, pedestrian accessibility and outstanding environmental work raises a legitimate question as to whether sufficient information presently exists to make an informed planning judgment.

For those reasons, I request that the application is refused in its present form or, at minimum, that determination is deferred until the outstanding technical evidence and statutory consultee responses satisfactorily address these matters.

11. Government should consider a genuinely self-contained alternative

I do not believe the only alternatives available to Government are hotels or placing very large accommodation centres alongside existing towns and villages.

If large-scale asylum accommodation is going to remain a long-term national requirement, Government should treat it as national infrastructure and investigate sites specifically suited to that purpose.

I have therefore attached:

“A Proposal for Self-Contained Island Asylum Reception & Processing Centres.”

The proposal asks Government to undertake a formal feasibility and whole-life cost assessment of purpose-built reception and processing centres on suitable remote UK islands.

It identifies Gruinard Island as the primary feasibility case study.

Gruinard has no permanent residential population, substantial land area and is situated close to mainland Scotland. Despite its historic association with biological-weapons testing, the island was formally declared safe following Government decontamination.

I am not asserting that Gruinard has already been proven suitable.

I am asking Government to establish whether it could be.

The attached paper also identifies Stroma, Flotta and suitable parts of Hoy as alternative candidates for assessment.

Under this model, residents would not be detained.

They would remain legally free to leave and arrange their own lawful transportation.

However, accommodation, food, primary healthcare, Home Office processing, legal/video facilities, utilities, recreation and other essential services would predominantly be provided on site.

Routine Government-funded discretionary transport into surrounding communities would therefore not need to form the basis of the operating model, while transport required for specific legal, medical or operational obligations could still be provided.

Staff could use dedicated transport or be accommodated on site.

The objective is to minimise avoidable impacts upon established communities while identity, security and immigration status are being determined, while simultaneously concentrating resources upon processing asylum claims efficiently.

This would also allow Government to design infrastructure specifically around the requirements of asylum reception rather than repeatedly adapting sites originally built for completely different purposes.

12. Compare the costs properly

Before committing substantial public money to MOD Bicester, I ask Government to publish a transparent comparison between Bicester and at least one purpose-built self-contained alternative.

That comparison should include:

- land/acquisition;
- capital construction;
- accommodation;
- electricity;
- water;
- wastewater;
- healthcare;
- policing and security;
- transport;
- staffing;
- local-authority impacts;
- decommissioning;
- annual operating expenditure;
- and whole-life cost per resident.

It should examine at least 10-, 20- and 30-year periods.

An island facility may require significantly greater initial investment.

However, if large-scale asylum accommodation remains necessary for decades, purpose-built permanent national infrastructure could potentially represent better long-term value than repeatedly creating and decommissioning temporary mainland sites.

That question should be answered with evidence.

13. My request to MHCLG

I therefore request that:

1. My objection is formally registered against PCU/RARE/C3105/3378843.

2. The unresolved technical matters identified above are addressed before determination.

3. The attached alternative-site proposal is forwarded to the Home Office and relevant Government departments for consideration.

4. Government commissions or explains whether it has already undertaken a national alternative-sites assessment comparing self-contained remote locations with large mainland sites such as MOD Bicester.

5. Gruinard Island and other potentially suitable remote islands are objectively assessed rather than dismissed without engineering and economic evaluation.

6. Government publishes the expected capital cost, annual operating cost and cost per occupied bed of MOD Bicester.

7. I am informed of the formal representation deadline and any significant additional or amended technical information submitted by the applicant.

The Government is proposing to accommodate a population equivalent to a small settlement at MOD Bicester for at least a decade.

That deserves substantially more scrutiny than simply asking whether modular buildings can physically be placed on MOD land.

The question should be:

Is Bicester genuinely the safest, most appropriate and best-value location available nationally?

Until Government can demonstrate that it is, I do not believe this application should be approved.

Kind regards,

[redacted]

Sent from my iPhone