From: [redacted]
To: Crown Casework
Subject: Ref: PCU/RARE/C3105/3378843
Date: 07 September 2026 11:48:23

[redacted]

Dear Sir/Madam,

Ref: PCU/RARE/C3105/3378843

Also relevant: PCU/RARE/J1725/3378659 and PCU/EIASCR/C3105/3378828

I have serious concerns about this planning application for Site A, MOD Bicester, and its impact on vulnerable asylum seekers. These people may include teenagers who are likely to have suffered trauma to enter the UK. Yet the provisions for them are totally inadequate.

Highways and pedestrian safety

The following statement by the Secretary of State was made on 26 August 2026:

"To enter or exit the site on foot would require considerable care and SUs will be strongly encouraged to only do so using the shuttle bus provision on safety grounds. To further emphasise the potential danger, high visibility vests will be provided to those leaving on foot and further discourage this mode."

This statement acknowledges that leaving the site on foot is dangerous and that high-visibility vests, which people may assume protect them, are actually there to discourage walking.

Drainage and flooding

The standard odour boundary for a wastewater treatment works is 250 metres. The Home Office proposes to put bedrooms at 45 metres. No odour assessment has been carried out to prove this is safe. Why, with such a large site, are they proposing this? The Drainage Design Statement of June 2026 states the following:

- "A standard odour boundary from a WwTW is ~250 m from the source of odour."
- "An odour impact assessment will need to be undertaken."
- "The residential and welfare units are intended to be approximately 45 m from the WwTW for future phases."

This site comes under the remit of Thames Water. Yet Drainage Design Statement, section 9.2 states:

"It has not been possible to liaise with the statutory undertaker within the RIBA 2 design programme."

The only Thames Water material in the entire application is a routine property search: a map of pipes, carrying the words "No responsibility can be accepted for any error or omission in the replies", and an offer to arrange a full flow and pressure test "for a fee".

There is no evidence that fee was paid.

“Whilst Approach 1 is the preferred, Approach 3 was selected for the RIBA 2 approach as there is not enough information to confirm the feasibility of the other approaches.”

Approach 3 is a brand-new sewage treatment works on site, discharging to a watercourse.

Yet Drainage Design Statement, section 9.5 states:

“At present, there are no apparent watercourses that seem suitable for discharge within the curtilage of the site at MOD015.”

The three options the document says it considered for solving that problem appear as three empty bullet points.

In the meantime, tankering is proposed. The initial phase is to be served by a cesspool with the waste taken away by lorry. Phase 1 is 408 people at 140 litres a head per day, which is roughly two tanker loads a day, every day, down the B4011, to a licensed facility that has not been identified. No document in the application assesses those movements.

The accommodation for these vulnerable asylum seekers is to go on the northern hardstanding. That hardstanding is “the lowest part of the site”. The MOD site team confirmed it “is prone to frequent surface water flooding”. The cause is two pumps that have failed, and “it was not possible to verify the existence, location, or specification of these pumps during the visit”. The gullies and drains are blocked, “which would likely result in flooding regardless of pump status”.

Photographs have been provided to the Secretary of State showing the proposed site entirely underwater. Can you imagine the mental stress caused by such flooding to asylum seekers who risked their lives crossing the channel in dinghies?

The Flood Risk Assessment assesses the site’s vulnerability classification as “Less Vulnerable”, which is the classification of a military storage depot. It notes only that “it is possible that any future development may be at a higher vulnerability”.

Residential accommodation is “More Vulnerable”. On that basis it concludes “an exception test would not be required”. It refers throughout to “any future development”, because it was written for a site, not for this planning proposal.

It also downgrades the surface water flood risk from “high” to “moderate” on the strength of a private drainage network that it has never surveyed, that the Utilities report calls “largely nonoperational” with “blocked assets”, and that the Flood Risk Assessment itself then recommends should be CCTV surveyed to find out what condition it is in.

And, on the sequential test, this: “Where possible, any new development should be located outside of any flood extents to avoid triggering the need for a Sequential Test.”

This makes it clear that the stated purpose is not safety. It is avoiding a test.

Incidentally, the receiving watercourse, the River Ray, was classified in 2022 as having “bad ecological status.”

With regard to clean water, the Drainage Design Statement assumes a demand of 140 litres per person per day. For 1,256 residents and 130 staff that is roughly 194 cubic metres a day, every day, in a region the Environment Agency classifies as seriously water stressed.

The Utilities and Infrastructure Assessment records that the site's water network is private, that a site inspection "suggests that the site network is of limited capacity relative to any concentrated development", and that the design is proceeding "on the assumption" that potable water will be supplemented by storage tanks, "subject to available capacity". The only Thames Water material in the application is a routine pipe map. There is no flow and pressure test, and no capacity confirmation for clean water any more than for foul.

Fire risk

The Fire Safety Strategy for a facility housing 1,256 people is a RIBA Stage 2 document dated May 2026. Its contents page lists sections on Travel Distances, Minimum Number of Exits, Evacuation Strategy, Fire Vehicle Access Routes and Water Supplies. In the document as published, those sections contain no content. There is no occupancy figure. No travel distances. No number of exits. No firefighting water supply. No hydrants. Neither the nearest fire station nor response times are mentioned.

Oxfordshire Fire and Rescue Service does not appear to have been consulted. What it does say, repeatedly, is that it does not have the information:

• "More information is required to give specific requirements on the category."

• "To give specific structural requirements, more information is necessary."

• "Reaction to fire classification is to be determined when specific GA plans and building heights are provided."

• "In order to undertake these calculations GA plans and elevations of each building will be required."

The one operational problem the fire strategy does identify, it cannot solve: "Provision of easy and speedy entry points to the site … for fire-fighters and their equipment, as the site has a secure fence around its perimeter information on how they will gain access through this will be needed." — Fire Safety Strategy, section 9.1

The Home Office's planning statement nonetheless concludes, at paragraph 7.75, that "the proposals are in accordance with the Building Regulations 2010 (Part B)", having conceded at 7.74 that "detailed escape distances, structural fire resistance and space separation" remain outstanding.

Utilities

The Utilities and Infrastructure Assessment reports that the electrical network's "condition, capacity and configuration … are currently unknown" and that "the capacity of the primary intake … has not been verified at this stage". Its conclusion: "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." Utilities and Infrastructure Assessment, Section 4.2

Ecology

The entire ecological evidence base for a 1,256-person development on ten hectares of a wildlife-rich former ordnance depot is one field survey, carried out between 26 March and 10 April 2026, with restricted access, outside the optimal window, by a consultant the report describes as being of "capable" competency.

The report's own limitations section says the rest:

• "The survey was undertaken in late March, which is just outside the optimal survey window."

• "Access was possible to all areas of the site except for those that were not permissible by the Barracks, with preliminary roost assessments (PRAs) of buildings only completed on the exterior of buildings." Buildings, please note, which are due to be demolished.

• "To determine presence or likely absence of protected species usually requires multiple visits at suitable times of the year. This survey … from only a single visit."

• "No historic ecological surveys relevant to the site have been identified."

The nine surveys that have not happened are listed in the Home Office's own Planning Proposal Statement, paragraph 7.34, in the future tense:

1. Arncott Bridge SSSI Impact Zone: "mitigation requirements to be discussed with Natural England"

2. Badgers: pre-construction checks recommended

3. Hazel dormouse: "further site surveys are required"

4. Bats (roosting): survey required

5. Bats (in trees): survey required

6. Bats (foraging and commuting): activity survey required

7. Breeding birds: "further surveys … are required"

8. Great crested newts: "further assessment required"

9. Reptiles: "a reptile survey is required and will be carried out"

Add barn owl and terrestrial invertebrates from the screening request, and the applicant's ecologist notes "the likely presence of barn owl".

And then, at paragraph 7.35, before a single one of those surveys exists: "The proposed development would incorporate sufficient ecological mitigation to prevent or minimise any adverse impacts on protected species and habitats." Planning Proposal Statement, para 7.35

There is no biodiversity net gain assessment, no metric calculation, no baseline value, no

percentage and no Biodiversity Gain Plan. The covering letter lists all twenty-five submitted documents and there is no such document on the list.

The site is 10.22 hectares, so the small-sites exemption does not apply. The use is expected to last at least ten years, so the five-year temporary exemption does not apply. The Planning Proposal Statement's position, at paragraph 7.34, is that the proposal is "capable of complying" with biodiversity policy. Not actually complying, just capable of complying.

I could go on, but I will conclude here by saying that this planning application is not urgent; it is **premature** and should be rejected on that basis and the arguments set out above.

Yours faithfully,

[redacted]