From: [redacted]
To: Crown Casework
Subject: PCU/RARE/C3105/3378843 MOD Bicester Site A.
Date: 07 September 2026 08:35:11

[redacted]

To: The Secretary of State for Housing, Communities and Local Government

Planning reference: PCU/RARE/C3105/3378843
Proposal: Full planning permission for the temporary change of use of MOD Bicester Site A in connection with the phased provision of non-detained asylum accommodation, including modular accommodation and associated infrastructure for up to 1,256 residents.

FORMAL OBJECTION TO THE PROPOSED DEVELOPMENT AT MOD BICESTER SITE A

Dear Sir/Madam,

I wish to register my formal objection to planning application PCU/RARE/C3105/3378843 for the proposed temporary use and redevelopment of MOD Bicester Site A.

My objection is based upon material planning considerations concerning the suitability and sustainability of the site, highway safety and accessibility, infrastructure capacity, drainage and flood risk, environmental effects, landscape and visual impact, and the scale and intensity of the proposed development.

I respectfully request that the application be refused unless and until these matters have been satisfactorily demonstrated, assessed and addressed.

1. The location is unsuitable for a development of this scale

The applicant's own Transport Assessment acknowledges that, from the perspective of sustainable travel, “the location of the site is not ideal.”

This is a significant admission given the proposed scale of the development.

The Transport Assessment records that, because of the rural location, there are limited amenities or facilities near the site and that there are no other facilities within a 2 km walking distance.

The proposed development would therefore create a very substantial population in a relatively isolated location, dependent to a significant degree upon organised transport for access to services and facilities outside the site.

This conflicts with the objectives of sustainable development and with the transport principles contained within the National Planning Policy Framework (NPPF), including the requirement to prioritise sustainable transport, provide safe and suitable access and promote walking, cycling and public transport.

The applicant cannot overcome an inherently unsuitable location simply by making the development more self-contained or by proposing shuttle buses. Those measures are mitigation for the site's poor location rather than evidence that the location itself is sustainable.

2. Highway and pedestrian safety

The proposed development would introduce a very substantial new population and associated staff, servicing, deliveries, contractors and other vehicle movements onto a rural highway network.

The applicant's Transport Assessment confirms that the B4011 is subject to a 50 mph speed limit and that the immediate area around the northern site access has no street lighting and no footways.

The assessment also records that the footways around the southern access are only approximately 1 metre wide and that there are no formal dropped kerbs or crossing facilities.

This raises serious concerns regarding pedestrian safety, particularly given the scale of the proposed population and the inevitable need for some residents and staff to travel beyond the site.

The application should therefore not be accepted on the assumption that the proposed shuttle-bus arrangements will eliminate pedestrian movements. The planning authority should consider what happens in practice, including journeys undertaken independently, movements by visitors, staff movements, deliveries, taxis and emergency situations.

The NPPF requires safe and suitable access for all users and requires development to prioritise pedestrian and cycle movements.

I consider that the existing highway environment has not been demonstrated to provide an appropriate standard of safe pedestrian and cycle connectivity for a development of this magnitude.

3. The scale of the development is disproportionate to its surroundings

The proposal would accommodate up to 1,256 people, in addition to staff and operational personnel.

This is a development of a scale comparable with a substantial settlement, yet it is proposed in a location with very limited surrounding facilities and infrastructure.

The sheer scale of the proposal is therefore a material consideration when assessing:

- highway capacity and safety;
- pedestrian and cycle accessibility;
- water and wastewater infrastructure;
- emergency services;
- healthcare provision;
- drainage;
- noise;
- landscape and visual effects;
- ecological effects; and

- the relationship between the development and surrounding settlements.

The fact that the proposal is described as temporary does not remove these impacts. The proposed period is 10 years, which is a substantial period in planning terms.

Moreover, the applicant's Transport Assessment states that the facilities are being designed to operate for longer than ten years should that subsequently be required. The supposedly temporary nature of the proposal should therefore not be given disproportionate weight.

4. Wastewater and infrastructure capacity has not been adequately demonstrated

I am particularly concerned by the submitted Drainage Design Statement.

It states that no definitive information is currently available regarding the capacity of the nearest wastewater treatment works or its ability to accept the projected flows from the proposed development.

It also states that the capacity of the infrastructure required to convey foul water to the treatment works is not well understood.

The document further states that it was necessary to consider alternative solutions because sufficient information had not been obtained.

This is a significant issue.

A development accommodating up to 1,256 people cannot reasonably proceed on the basis that fundamental wastewater infrastructure capacity will be established at a later date.

The applicant's own evidence indicates that the preferred municipal wastewater solution had not been confirmed and that further verification is required regarding the sewer network, pumping stations and receiving wastewater treatment works.

This raises a material planning concern under, amongst others, the principles contained in Cherwell Local Plan Policies ESD 6, ESD 7 and ESD 8, concerning flood risk, sustainable drainage and water resources.

I request that the decision-maker require definitive evidence of wastewater capacity and an acceptable, fully consented and deliverable wastewater solution before planning permission is granted.

5. Flood risk and surface-water management

The Planning Proposal Statement acknowledges that Environment Agency surface-water mapping identifies considerable areas of the site as being at high risk of surface-water flooding.

The application therefore needs to demonstrate convincingly that the proposed development, including its extensive modular accommodation, roads, parking and associated infrastructure, will not increase flood risk either on the site or elsewhere.

This is particularly important given the scale of new development and the significant amount of associated infrastructure proposed.

Cherwell Local Plan Policies ESD 6 – Sustainable Flood Risk Management and ESD 7 –

Sustainable Drainage Systems are directly relevant.

The drainage strategy should be independently scrutinised and should demonstrate:

1. that the proposed drainage system is technically deliverable;
2. that sufficient capacity exists throughout the lifetime of the development;
3. that climate-change allowances have been properly incorporated;
4. that exceedance flows have been properly assessed;
5. that there will be no increased flood risk to neighbouring land or properties; and
6. that long-term maintenance and management arrangements are secure.

6. Biodiversity and ecological impacts

The application documents themselves acknowledge that further targeted ecological survey work and mitigation will be required as the design progresses.

That raises the question of whether the ecological evidence is sufficiently complete to enable the Secretary of State to reach a properly informed planning decision.

The development is immediately adjacent to agricultural land and the Jubilee Nature Reserve area, and therefore the effects of construction, lighting, noise, traffic, drainage and long-term occupation require careful assessment.

Cherwell Local Plan Policies ESD 10 – Protection and Enhancement of Biodiversity and the Natural Environment and ESD 11 – Conservation Target Areas, together with relevant national policy, should be fully applied.

I request that no permission be granted until all necessary ecological surveys have been completed and the mitigation hierarchy has been properly demonstrated.

7. Landscape and visual impact

The proposal involves the construction of a substantial accommodation complex comprising modular buildings, roads, parking, security infrastructure, staff facilities, welfare facilities and other associated development.

Although the site is previously developed land, this does not mean that a development of this scale would have no landscape impact.

The proposal must be assessed against Cherwell Local Plan Policy ESD 13 – Local Landscape Protection and Enhancement and Policy ESD 15 – The Character of the Built and Historic Environment.

Particular consideration should be given to:

- the scale and massing of the modular accommodation;
- the cumulative visual effect of numerous buildings;
- security fencing and associated infrastructure;
- external lighting;
- views from surrounding roads and settlements;
- the effect on the rural character of the area; and
- the long-term visual consequences of a ten-year occupation.

8. Noise, lighting and disturbance

A development operating 24 hours a day, seven days a week, with accommodation, staff facilities, servicing, security, vehicles, lighting and recreational facilities has the potential to generate significant noise and disturbance.

The noise assessment should therefore be considered carefully, particularly in relation to nearby residential properties and rural receptors.

Conditions should not be relied upon as a substitute for establishing at the outset that the development is capable of operating without unacceptable adverse effects.

External lighting should also be assessed in relation to residential amenity, landscape character, ecology and the rural environment.

9. Infrastructure and public services

The proposal would place additional demands upon local infrastructure and services.

The Government has itself stated that the suitability assessment for the site is considering the impact on local services and communities.

The application should therefore demonstrate, with evidence rather than assumptions, that adequate arrangements exist for:

- healthcare;
- emergency medical response;
- fire and rescue services;
- policing;
- waste collection and disposal;
- water supply;
- wastewater treatment;
- transport;
- emergency access; and
- other essential infrastructure.

The scale of the proposal makes this particularly important.

10. Previous planning history is relevant

The site has previously been considered for asylum accommodation.

The current Transport Assessment records that an asylum accommodation centre was considered at the site in the early 2000s and that the proposal followed a public inquiry.

Importantly, the contemporary Planning Inspector's report concluded that the site was in a relatively isolated rural location, was poorly served by public transport and was too far from nearby towns for convenient walking or cycling.

I recognise that the previous proposal was considered under a different policy framework and involved a different scheme. Nevertheless, the previous assessment of the site's location and accessibility is a relevant planning consideration, particularly because many of the fundamental geographical characteristics of the site have not changed.

The current application should therefore explain convincingly what has materially changed

since the earlier inquiry such that the location is now considered appropriate for a development substantially larger than the previously proposed accommodation centre.

11. The expedited planning route should not reduce the level of scrutiny

I recognise that this is being considered under the Urgent Crown Development procedure.

However, the Government's own guidance confirms that representations will be taken into account insofar as they raise material planning considerations relevant to the proposed development.

The use of an expedited procedure should not result in a lower standard of assessment.

Indeed, given the unusual scale and nature of the proposal, it is particularly important that the decision-maker has before it complete and reliable evidence concerning highways, drainage, infrastructure, ecology, landscape, noise and other material considerations.

12. Planning balance

I recognise that the Government identifies a need for additional asylum accommodation and that this is capable of being a material consideration.

However, the existence of a national need does not automatically establish that this particular site is suitable.

The planning question is whether the identified need and any other benefits outweigh the adverse planning impacts of this particular proposal.

In my view, the evidence currently submitted does not satisfactorily demonstrate that the site is an appropriate, sustainable and safe location for a development of this scale.

The proposal would create substantial pressure on a rural location with limited nearby facilities and inadequate sustainable transport connections, while important questions remain concerning infrastructure capacity, wastewater, drainage, pedestrian accessibility and the environmental effects of the development.

REQUEST FOR REFUSAL

For the reasons set out above, I respectfully request that the Secretary of State refuse planning permission for application PCU/RARE/C3105/3378843.

At a minimum, if the Secretary of State is minded to approve the proposal, I request that no decision be made until the outstanding matters identified above have been fully resolved through robust, independently scrutinised evidence and that enforceable planning conditions and obligations are imposed to address all identified impacts.

I also request that particular weight be given to the applicant's own evidence acknowledging the site's poor sustainable-transport accessibility and the absence, at the time of assessment, of definitive confirmation of wastewater infrastructure capacity.

I would be grateful if this objection could be formally taken into account in determining the application.

Yours faithfully,

[redacted]
[Your address or locality, if you wish to provide it]

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