From: [redacted]
To: Crown Casework
Cc: planning@cherwelldc.gov.uk; Calum Miller MP; [redacted]
Subject: Formal Representation in Objection - PCU/RARE/C3105/3378843 - MOD Bicester Site A
Date: 07 September 2026 17:42:59

[redacted]

To the Crown Casework Unit
Ministry of Housing, Communities and Local Government

To: crowncasework@communities.gov.uk
cc: planning@cherwelldc.gov.uk
cc: calum.miller.mp@parliament.uk
[redacted]

7 September 2026

Formal Representation: Objection to Application PCU/RARE/C3105/3378843

Dear Sir or Madam,

[redacted] We are not protesters. We are not people who write to officials or sign petitions. We work, we pay our taxes, we try to look after our family, and we get on with things.

[redacted] for her and careful planning. It took decades of work to be in a position to carry it out. This house is not just where we live. It is how we have arranged our family's future. We did not take it lightly, and we did not expect it to be undone by an announcement made without our knowledge or consent.

We would also draw the decision-maker's attention at the outset to a specific inconsistency between what the public has been told and what the application documents say. The Home Office's own public factsheet for this site states that it would be designed to be largely self-sufficient to minimise any impact on the local community. The application documents confirm that the site cannot supply its own electricity, has no confirmed water supply, has no viable sewage treatment solution at full capacity, and has no on-site wastewater treatment plant currently in existence. The public was told one thing. The application says another. We ask that this discrepancy be noted as part of the broader context in which this community has received information about this proposal.

We are not planning professionals. The points we raise below are not technical arguments assembled by consultants. They are the questions the applicant's own documents raise - and which should have been answered before this application was submitted. We ask that each be considered on its merits before any determination is reached.

1. THE URGENT CROWN DEVELOPMENT PROCEDURE IS NOT APPROPRIATE FOR THIS APPLICATION

The Urgent Crown Development procedure is, by the Government's own guidance, intended for development that is both nationally important and genuinely urgent - where a decision needs to be made in a matter of days or weeks. The Housing Minister, Matthew Pennycook, described it in the delegated legislation committee as a route to be used very rarely, only where other planning routes cannot secure a decision quickly enough.

This application does not meet that test. The Ministry of Defence confirmed, in response to a Parliamentary Written Question, that its Head of Establishment at MOD Bicester was engaged on proposals to use the site for asylum accommodation in November 2025. Documents published on 2 September 2026 on the MHCLG site show that an ecological survey was conducted in March 2026. The site had therefore been under active consideration for at least seven months before the public announcement in June 2026.

That timeline cannot be squared with a case built on urgency. The Home Office's own Statement of National Importance describes a minimum operational life of ten years for the site and states that it is intended over time to be expanded as a long-term asylum accommodation solution. Urgent, it is not.

Our MP, Calum Miller, has formally written to the Secretary of State on precisely this point. We support his position entirely.

The application seeks a ten-year temporary permission. No financial bond, restoration guarantee or decommissioning plan appears to have been offered or required to ensure the site is actually restored at the end of that period. This is a standard planning requirement for temporary permissions of significant scale. The comparable scheme proposed at this location in the early 2000s was abandoned as uneconomic after substantial public expenditure, with no restoration guarantee in place. The risk that a ten-year temporary permission becomes a permanent fixture without adequate financial security is a material planning consideration that the application has not addressed.

2. CRITICAL INFRASTRUCTURE HAS NOT BEEN ASSESSED - APPROVAL WOULD BE PREMATURE

The application contains, by its own admission, multiple unresolved questions about the most basic things a development of this kind needs to function. These are not details to be confirmed later. They are the foundations, and they have not been laid.

The applicant's own documents confirm:

– The existing utility capacity is described as still to be determined.

– Thames Water has not been consulted. No borehole investigation has been carried out to confirm water supply capacity.

– Confirmed asbestos-containing material is present on the site. The proposal, as we understand it, is not to remove it but to cordon it off. For a development intending to house over 1,250 people for up to ten years, that is not a solution. It is a deferral, with health and liability consequences that grow with every year the cordoning holds - and every year it does not. We ask that a full, funded asbestos remediation plan be required before any determination is reached.

– Surface water flooding affects a significant portion of the site.

– The exact position of some drainage infrastructure is unknown.

A private developer submitting an application on these terms would not expect it to be considered ready for determination. The public interest is not served by applying a lower standard to the Crown.

3. THE POWER SUPPLY POSITION IS UNACCEPTABLE AND UNASSESSED

The applicant's own Utilities and Infrastructure Assessment states that the existing electricity infrastructure cannot currently be relied upon and that generator provision - temporary or permanent - shall therefore be incorporated. The estimated maximum demand is 2.16 MVA.

The Air Quality Screening Technical Note identifies road traffic as the principal operational emissions source. It does not quantify generator emissions at all.

An independent engineering assessment, based on the application's own figures, estimates potential diesel consumption of approximately 20,000 litres per day - around 7.3 million litres per year - requiring a fuel tanker delivery approximately every two days. At current prices, that is of the order of £8 million per year in fuel alone, before generator hire, maintenance and logistics. The carbon output is estimated at 18,900 tonnes of CO2e per year, against approximately 3,600 tonnes for equivalent grid electricity. More than five times the carbon impact.

[redacted]. Large-scale diesel generation around the clock, regular heavy tanker movements on roads that already have no footway or safe crossing, and NOx and particulate emissions that the application has not modelled - these are material considerations that have been entirely ignored. We ask that a full assessment of generator requirements, fuel logistics, air quality and noise be required before any determination is made.

4. THE DRAINAGE PLAN DOES NOT SCALE, GENERATES UNACCEPTABLE HGV MOVEMENTS AND POSES AN UNASSESSED RISK TO LOCAL WATERCOURSES

The applicant's Drainage Design Statement, at section 9.4, confirms that the initial phase may be served by a cesspool with waste tankered away. Section 9.2 of the same document states plainly that this is not a viable option for the total number of service users ultimately anticipated.

In Phase 1 alone, the applicant's own figures produce approximately 75,320 litres of foul waste per day, requiring roughly six tanker loads of 13,600 litres each - approximately 12 HGV movements per day on roads that the application itself confirms have no footway, no safe crossing and no lighting.

Treatment works fees for Phase 1 alone are estimated at approximately £38,500 per month, before haulage, storage and contingency.

The applicant has submitted a drainage strategy that its own engineers have said will not work at the proposed scale. That is not a technical footnote. It is the applicant conceding, in its own documents, that a core element of the proposal has no viable solution.

We would also note that Blackthorn and the surrounding area already experience surface water drainage issues. The application has made no assessment of the impact on local watercourses, drainage channels and low-lying land in the surrounding communities in the event of drainage system failure or overflow at the site. That is not a peripheral concern. For residents who already manage surface water on their land, it is a practical and immediate one.

We would also draw attention to the River Ray. A land quality assessment previously commissioned for this site by the Ministry of Defence itself identified the potential for the River Ray to be affected by direct run-off and discharges from the site. The River Ray is a named local watercourse. This risk does not appear to be assessed anywhere in the current application's drainage or flood risk documentation. On a site with confirmed asbestos-containing material, a documented history of storing poisons, corrosives and flammable materials, a 1970 spillage of 300 gallons of hydrochloric acid whose precise location is recorded as unknown, and a drainage strategy the applicant's own engineers acknowledge is unviable at full capacity, the potential for contaminated discharge to reach a named local watercourse is a material consideration that has been entirely overlooked. We ask that a full assessment of off-site drainage impact - including the effect on local watercourses and surrounding communities in failure scenarios - be required before any determination is reached.

5. MULTIPLE ECOLOGICAL SURVEYS ARE OUTSTANDING

The applicant's ecological assessment states, in its own words, that it cannot be considered comprehensive, and records that surveys for bats, breeding birds, reptiles, dormice and great crested newts remain outstanding. No biodiversity net gain assessment appears to have been produced, despite this being a standard requirement for developments of this kind.

Natural England appears to have been consulted more than once. The correspondence said to have resolved its concerns has not been published.

This is a rural site with significant ecological sensitivity. Granting approval before the ecological picture is complete would be contrary to normal planning practice and to the applicant's own obligations under environmental law.

6. HIGHWAY AND PEDESTRIAN SAFETY HAS NOT BEEN ADEQUATELY ADDRESSED

We drive Station Road and the surrounding lanes regularly. We know these roads.

The Transport Assessment contains no traffic count, no collision search and no safety assessment for Widnell Lane - the direct road between the site and Piddington. Three recorded collisions near the site access over five years are used to conclude that no further road safety analysis is required. Widnell Lane is not mentioned.

There is a recorded road safety incident on this corridor, near Blackthorn, in April 2024, in which a young child died. It is a matter of public record, reported by the BBC. It does not appear anywhere in the Transport Assessment.

The applicant's own documents confirm there is no pedestrian infrastructure serving the site, and that walking to nearby bus stops would not be possible. The proposed highway works include no new footway, no crossing and no lighting. The stated mitigation for the acknowledged danger of people leaving the site on foot is shuttle buses and high-visibility vests.

Where a footway exists at all on the surrounding roads, it is roughly one metre wide. The Department for Transport's own inclusive design guidance, which the Transport Assessment claims to follow, recommends a minimum of two metres.

Large sections of the baseline traffic and speed data are attributed to a road in Essex, transferred from a comparable scheme with different recorded staff shift times, rather than derived from a site-specific survey of these roads. Junction capacity modelling that concludes there is spare capacity carries the software's own warnings that results should be treated with caution, and sets heavy vehicle traffic to zero in three of the four modelled scenarios - on a site expected to generate daily coach, minibus, fuel tanker, waste tanker and delivery movements.

The application also makes no assessment of the impact on existing rural bus services if service users independently access them. Rural routes in this area already operate under significant pressure.

7. THE SCALE IS ENTIRELY DISPROPORTIONATE TO THE LOCATION

Piddington has a population of approximately 350 people, including 46 children. Blackthorn, where we live, has approximately 317 residents of all ages - men, women and children. Between both communities, we number around 667 people in total. The proposed centre would place 1,256 single adult men - confirmed by the Home Office to be aged between 18 and 65 - on our shared doorstep. That is nearly twice our combined population. It is worth being precise about what that comparison actually means: set against 1,256 men, our communities comprise roughly 300 women, elderly residents, children, and the men who live alongside them. It is not 667 adults against 1,256 adults. It is a whole community - in all its mix of ages and vulnerabilities - against a facility housing only single men. That context has not been addressed anywhere in the application.

The Prime Minister has stated publicly that wealthier areas should play a greater role in accommodating asylum seekers - a principle of proportionality that we do not dispute in principle. But proportionality, to be meaningful, must be applied consistently. Piddington's population is approximately 350. The proposed centre would house 1,256 people - nearly four times that population. By the Prime Minister's own proportional logic, the equivalent burden placed on the City of Manchester - population approximately 553,000 - would be to accommodate approximately 2.2 million single adult men in a single facility. The principle of proportionality, invoked by the Prime Minister himself, has not been applied to the relationship between this development and this specific community.

We also note that the applicant's own Unexploded Ordnance Risk Assessment scopes its work around accommodation for 3,510 service users - nearly three times the capacity stated elsewhere in the application. That discrepancy has not been explained. We ask that it be formally clarified before any determination is reached.

The application classifies the proposed use as C2A - Secure Residential Institutions. That is the same planning use class as prisons and detention centres. The Home Office has publicly described the facility as open and non-detained, with residents free to come and go. Both positions cannot be right. We ask the decision-maker to clarify which one it is actually determining.

8. THE COMMUNITY IMPACT HAS NOT BEEN ADEQUATELY ADDRESSED

The Home Office's own Environmental Screening Assessment acknowledges that the development may give rise to anxiety amongst local residents such as through fear of crime, and that service users can, albeit with difficulty, access local populated areas. It acknowledges that the ward area is more deprived than 71% of neighbourhoods in England. It identifies potential health effects on the elderly, the young, those with certain disabilities, and those in pregnancy and maternity.

It then dismisses those effects on the grounds of the site's relative remoteness. The same remoteness used to minimise community impact is the reason the site has no infrastructure, no transport and no services. Those two positions cannot be held simultaneously.

[redacted] he is precisely the kind of person the Home Office's own screening identifies as potentially affected by this development. The application acknowledges that impact and does not address it.

[redacted] [redacted]. They have always been able to play freely in this quiet rural village, around our garden and wooded area - we take them to the local parks - the kind of place that is rarer by the year, and the reason many people choose to live here. That is already changing. And it is changing at the precise moment when the Government's own research and its own financial commitments confirm that free outdoor play in safe rural settings is not a luxury - it is a measurable contributor to children's long-term mental health. Parents in both villages have told us directly that they will not feel able to let their children use local play areas freely if this development proceeds. The application does not assess that impact on community amenity at all.

We have heard from other residents of a property sale in this area that has already fallen through because of this proposal, and of someone who has been unable to obtain a mortgage on a local property because of the anticipated fall in values. These are not predictions of what might happen. In this community, they are already happening.

The financial impact is not abstract, and it reaches far beyond our own situation. We have spoken recently with a neighbour whose elderly parents have genuine health needs and can no longer drive. They had planned to sell their home here and move somewhere more suitable - closer to facilities, closer to the care they need. They cannot now. The fall in property values means that plan is no longer financially possible. They are not trapped by their age or their health. They are trapped by this

announcement. That is a specific, human consequence of a planning decision, and it is already happening before a single person has arrived at the site.

For us, the position is similar. [redacted] If we were to sell now - at the values already being seen in this area - we could not afford to return to where we were. [redacted] of careful decision-making, of working and saving and planning for our family's future, have been eroded - not by anything we did, but by an announcement made without our knowledge or consent. We will have less to live on and less for our children to inherit. [redacted]

This area risks becoming a community of people who are stuck. People who cannot sell because values have dropped, who cannot afford to move closer to the facilities or care they need, who cannot make the decisions that their own circumstances require. They cannot afford to stay. They cannot afford to go. That is the human cost of this application, and it does not appear anywhere in the applicant's documents.

We would also draw the decision-maker's attention to an equality omission in the application. An existing Traveller site sits approximately 150 metres from the site boundary. Travellers are a protected characteristic under the Equality Act 2010. The applicant's own Equality Impact Assessment does not mention this community or assess the impact of this development on them. The nearest settled community to the proposed development appears to have been entirely overlooked in the equality assessment.

9. THE IMPACT ON COMMUNITY RECREATIONAL FACILITIES HAS NOT BEEN ASSESSED

Play areas and recreational facilities used by local families are in the proximity of this site. The application does not assess the impact on their usability for the existing community.

The Government has recently committed £18 million to the refurbishment and improvement of children's play areas across the country, citing the importance of outdoor play to children's health and mental wellbeing. Research from the University of Exeter's Outdoor Play Research Centre, published in the Journal of Child Psychology and Psychiatry in June 2026, found that each additional day of outdoor play in the preschool years increases the likelihood of good mental health outcomes by up to 14 per cent.

The same Government is simultaneously proposing to place 1,256 people on the doorstep of communities where children currently enjoy exactly that kind of free, safe, rural play - the very conditions its own evidence says matter most. The impact on recreational amenity for existing residents - including children - is a material consideration. It has not been assessed.

10. HEALTHCARE, MEDICAL PROVISION AND WELFARE HAVE NOT BEEN ADEQUATELY ASSESSED

We have heard that on-site GP and dental provision may be planned for the facility. If so, that commitment does not appear transparently in the application documents, and we ask that it be set out clearly - including how it will be staffed, resourced and sustained over the proposed ten-year operational period.

However, on-site provision does not resolve the wider question of secondary and specialist healthcare. The application does not address how 1,256 people will access hospital care, emergency treatment, or the range of specialist and community health services - physiotherapy, chiropody, mental health referrals, and others - that a population of this size will inevitably require. These are not minor considerations. They represent real and additional demand on services that local residents in the Bicester area already find stretched. No assessment of the cumulative impact on NHS and community health capacity in this area appears to have been undertaken. We ask that one be required before any determination is reached.

We would also note the practical question of how people reach those services from a site with no public transport and no pedestrian route to the nearest bus stop - a question the application has not answered for routine journeys, let alone urgent or emergency ones.

The application documents contain sections on Suicide and Self-Harm Prevention, Health and Safety, and Handling a Death at the Site. All are substantially or entirely redacted. The public - and, we would argue, the decision-maker - cannot properly assess the adequacy of welfare provision because the relevant parts of the application are concealed.

The Home Office's factsheet states that service users arrive following initial screening checks against policing and immigration databases. We note that these checks are, by their nature, limited to

databases held in the UK and by UK immigration authorities. They do not include criminal records from countries of origin where such records may not be accessible or shared. The Government's own published data confirms that a significant proportion of those who go through equivalent initial screening processes at comparable facilities are subsequently found not to qualify for asylum for various reasons. The application does not address the known limitations of the screening methodology, what proportion of those screened in this way may subsequently be found to present a risk, or what operational protocols exist for managing such situations once people have already arrived at the site. The adequacy of the risk assessment built on this screening process has not been demonstrated. We ask that it be required before any determination is reached.

Independent evidence, including High Court findings concerning a comparable site, has established that large-scale isolated institutional accommodation of this kind carries a foreseeable risk of mental health deterioration amongst occupants, and described the Home Office's failure to assess the equalities impact of its own allocation policy as a most serious and inexplicable omission. A separate High Court judgment in 2026 found against the Home Office on every ground argued, in a case concerning the very allocation policy that would govern how people are sent to sites such as this one.

We ask that the Secretary of State require disclosure of the redacted welfare sections, or that independent assessment of their adequacy be made a condition of any determination.

11. EMERGENCY SERVICES RESPONSE, ACCESS AND THE PROXIMITY OF HMP BULLINGDON HAVE NOT BEEN ADEQUATELY ADDRESSED

No site-specific capacity assessments appear to have been agreed with Thames Valley Police, Oxfordshire Fire and Rescue Service, South Central Ambulance Service, or the county council as highway and flood authority. None of these bodies is a mandatory statutory consultee under the fast-track procedure being used. Under normal planning procedure, they would be.

The roads around this site are narrow rural roads with no footway. The application acknowledges that service users leaving the site on foot presents a danger. If they are walking along roads with no safe space, they create a direct hazard to emergency vehicle access and response times. An ambulance or fire engine responding to an incident on these roads - where pedestrians have nowhere to stand clear - is a foreseeable risk that the application has not addressed.

We also note that HMP Bullingdon - a Category B prison that the applicant's own Statement of National Importance records as directly opposite the site - is currently being expanded. Construction to add approximately 247 places and increase total capacity to over 1,300 prisoners was due to complete in August 2026. The application assessed the proximity of the existing prison. The impact of the expanded prison - on emergency services capacity, on road access, and on the cumulative effect of both major developments in the same rural area - has not been assessed.

We would also draw the decision-maker's attention to a welfare consideration that is the inverse of the usual community concern. Isolated, economically deprived individuals with minimal income, no ability to work, and no established support network are recognised as vulnerable to exploitation by criminal networks. The proximity of an expanding Category B prison to a population of 1,256 people meeting precisely that description, in a remote location, has not been assessed as a safeguarding risk anywhere in the application. We raise this not as an assumption about the character of future occupants, but as a foreseeable risk to their own welfare that the application has not addressed.

12. THE APPLICATION IS MATERIALLY INCOMPLETE

The Site Parameters Plan - one of only three drawings submitted for approval - contains no dimensions, no heights, no access points, no parking numbers and no key.

No site layout, no floor plans, no elevations, no external lighting layout, no boundary or fencing plan and no drainage layout has been provided.

At least nine matters are deferred for resolution after any permission is granted, including the lighting scheme, the contamination investigation, the long-term power supply and the long-term drainage solution.

The Application Form's tables for materials, parking numbers and staffing levels appear to have been left blank, despite figures for these matters appearing elsewhere in the submitted documents.

The Air Quality Screening Technical Note states in its summary that it involved identifying sensitive receptors. A later section of the same document states plainly that no sensitive receptors were selected. The document contradicts itself.

The applicant's own documents are internally inconsistent on the number of Nissen huts to be

demolished, the site's level above ordnance datum, the deprivation ranking of the local area, the intended length of stay for occupants, and whether the site is vacant or in active operational use.

These are not typographical errors. They are signs of an application assembled under pressure, without the time or evidence base to make it coherent. If a private developer submitted an application in this condition, it would be returned. We ask that the same standards apply here.

13. NO COMMUNITY LIAISON OR PREPAREDNESS PLAN HAS BEEN PROVIDED

The application makes no provision for community education, liaison or preparedness beyond the site boundary. Local residents have no guidance on how to respond if they encounter a service user in distress in the surrounding area - how to help, what agencies to contact, what cultural or communication considerations apply, or what protocols exist.

That is not hostility. It is the most basic practical gap in a proposal of this kind. We would want to help if we encountered someone in difficulty. We do not know how. The application does not say.

We would also note that some residents of isolated rural properties, including ourselves, in the vicinity of this site have begun conducting their own security assessments as a result of this proposal. That is not hysteria. It is a reasonable response to a situation in which the applicant has provided no guidance, no individual risk assessment and no support whatsoever to the residential communities closest to the site. The application has created a level of personal anxiety and personal cost - in time, in worry, in freedom - that it has neither acknowledged nor addressed.

The cost and resource implications of delivering meaningful community liaison and cultural awareness support across the affected communities have not been identified, budgeted for or addressed anywhere in the documents. We ask that a fully costed community liaison plan be required as a condition of any determination.

14. THE DEMOGRAPHIC STRUCTURE OF THE PROPOSED POPULATION AND ITS IMPACT ON COMMUNITY COHESION HAS NOT BEEN ASSESSED

The application has not assessed the social cohesion implications of the demographic profile it proposes to introduce into this area. Normal, functioning communities comprise a mix of ages, sexes and family structures. The proposed development would create, within an area currently home to approximately 667 residents of all ages and backgrounds, an additional population of 1,256 single adult men with no family connections, no established community ties, no employment and no social anchors in the area.

Published research by the European Spatial Planning Observation Network, a body whose work directly informs planning policy across Europe, confirms that significant gender imbalances in a local population are both a territorial development concern and a condition that has measurable impacts on social and territorial cohesion. That research applies in planning contexts precisely because demographic structure is a legitimate material consideration, not merely a political one.

No assessment of the social cohesion impact of introducing this specific demographic profile into these specific communities has been provided. We ask that one be required before any determination is reached.

15. THE CUMULATIVE IMPACT OF MULTIPLE MAJOR DEVELOPMENTS IN THIS AREA HAS NOT BEEN ASSESSED

Sites D and E of MOD Bicester already have planning permission for a development of approximately 1,900 new homes, a primary school, shops and community facilities - the Graven Hill development, currently under construction. HMP Bullingdon is simultaneously being expanded to add approximately 247 prison places, bringing its total capacity to over 1,300. Site A now proposes to add 1,256 people to the same rural area.

Three major developments are being delivered simultaneously in this rural area, with no cumulative assessment of their combined impact on local road capacity, water supply, sewage infrastructure, emergency services capacity, community facilities, or the character and cohesion of the surrounding settlements.

Cumulative impact assessment is a standard planning requirement. The interaction between these three developments - in terms of construction traffic, utility demand, infrastructure pressure and community change - has not been assessed at all. We ask that a cumulative impact assessment covering all three developments be required before any determination is reached on this application.

CONCLUSION

We have written to the Home Secretary. We have attended the meetings. Anything that has been released, we have tried to read with an open mind and understand. We have engaged with every proper channel available to us, because we believe that is what citizens in a democracy are supposed to do. We are not people who march or join public demonstrations - that is not how we have ever chosen to make our voices heard. But we are aware that many of our neighbours feel so strongly about this proposal that they are prepared to do exactly that. That is their democratic right, and we understand why they feel it. What it tells us - and what we ask the decision-maker to note - is the depth and breadth of feeling in these communities. When ordinary, law-abiding people who have never protested in their lives find themselves considering it, something has gone seriously wrong with the way a decision has been handled.

Whatever views one holds on asylum policy more broadly, our objection to this specific application is based entirely on the material planning considerations set out above. We ask that it be assessed on that basis.

If a private developer submitted this application, it would not be considered ready to determine. The Crown should be held to the same standard.

We ask that the application be refused, or that a substantially extended representation period and further information requirements be imposed before any determination is reached.

Yours faithfully,

[redacted]

07 September 2026