# Formal representation

*MOD Bicester Site A* • [redacted]

Application: PCU/RARE/C3105/3378843
To: Secretary of State for Housing, Communities and Local Government
From [redacted] • Prepared: 6 September 2026

Dear Secretary of State,

I object to the proposed ten-year use of MOD Bicester Site A as non-detained asylum accommodation for up to 1,256 people. I write as a resident and parent, not on behalf of my business or the Wrong Plan Wrong Site campaign, whose objectives I support. [1]

I recognise the need for suitable asylum accommodation and the value of reusing previously developed land. My concern is whether this particular proposal is suitable, whether its important assumptions are supported by evidence, and whether the safeguards being relied upon will work in practice.

**Please refuse permission if unacceptable impacts cannot be adequately mitigated. Where further evidence could resolve a material issue, please defer determination until it can be properly considered.** I accept that some details can lawfully be secured through conditions; my objection is to relying on essential safeguards without demonstrating that they are adequate and deliverable.

## 1. Safety and an up-to-date equality assessment

My teenage daughter should be able to meet friends and use Bicester's public spaces with confidence. That does not mean treating asylum seekers as dangerous. It means asking the same practical questions I would ask about any large institutional development: how will people travel, which spaces will they use, and how will foreseeable problems be prevented and addressed?

The Planning Proposal Statement relies on operational and security arrangements, with a full Operational Management Plan to follow appointment of the provider. The Equality Impact Assessment does consider neighbouring communities. The question is not whether those subjects are mentioned, but whether the evidence and mitigation are sufficient for the actual scale and duration proposed. [2] [3]

Please identify the non-sensitive assessment of off-site safety, harassment, accessibility and community relations, including likely routes, waiting points and public spaces. Distinguish credible evidence from unverified fears, quantify where reasonable, and explain the remaining uncertainty.

The decision must address the Public Sector Equality Duty and current planning policy. The August 2026 NPPF expressly addresses safe, inclusive spaces and routes, including for women and girls. Explain how those considerations have informed this proposal for local residents and the people accommodated alike. [4] [5]

The published EqIA was signed off on 28 May. The Home Office's 29 July allocation policy subsequently restored specified protections concerning vulnerable people, ex-MOD sites and room-sharing. Where is the review reconciling Bicester's assessment, admission rules, services and transfer arrangements with that policy? The earlier date alone proves no breach, but the decision needs a current basis. [3] [6]

## 2. Funded police and healthcare capacity

Residents need to know what additional demand Thames Valley Police anticipates, what resources have been requested and agreed, and what remains unresolved. Distinguish ordinary site-related work, off-site incidents and protest-related demand. A non-sensitive summary should explain how existing neighbourhood policing will be protected.

The Home Office grant scheme is discretionary and excludes opportunity costs such as normal-duty officer time. Funding extra expenditure does not necessarily replace capacity diverted from other work. Please identify the assessed shortfall, if any, and the arrangements addressing it. [7]

The same distinction applies to healthcare: space for a clinic is not the same as a staffed and funded service. Identify the commissioned provision, hours, primary and mental-health care, interpretation, out-of-hours support and referral capacity. Test the workload against expected arrivals and turnover, not just the number of beds. I acknowledge the health consideration already in the application; I am asking how the service will actually be delivered. [2] [8]

## 3. Transport assumptions that can be tested

The Transport Assessment uses a seven-day Wethersfield survey beginning on 16 April 2026. Paragraph 3.10.7 applies the recorded trip generation without adjustment because the maximum capacities are similar. **Maximum capacity is not the same as actual activity during a survey week.** [9]

Confirm Wethersfield's actual occupancy, staffing, shuttle operation and relevant deliveries during that week. Explain the treatment of background traffic and show why the observations are representative of Bicester at full operation. Supply non-sensitive aggregate inputs and any sensitivity tests, together with the highway authority's assessment. I am questioning an assumption, not claiming an undercount has been proved.

On-site facilities may reduce journeys, but this is not a detained site. Independent travel still needs a safe, workable plan. Specify shuttle destinations, hours, capacity, accessibility and funding, and the pedestrian measures required before occupation. [10]

NPPF TR6(2) calls for fallback options where travel-plan measures fail. What happens when a shuttle is unavailable, insufficient or not used? Identify the safe alternative and who will provide it. The plan should not depend on everybody making every journey exactly as predicted. [5]

## 4. What has been learned, and what happens when arrangements fail?

I am not asking the Government to predict the future. **I am asking it to show what it has learned from the past.** Identify the evaluation of existing large sites actually used to design Bicester, its findings and the resulting changes to this proposal.

For relevant police, safeguarding, health, transport and community data, state the period, occupancy and limitations. Separate complaints, recorded incidents, arrests and convictions; distinguish alleged offending from incidents where site residents are victims or other people are involved. The supporting review explains both the documented problems and the limits of comparisons.

Missing or fragmented information is not proof of either deliberate concealment or an absence of impact. Explain how significant uncertainty has been allowed for rather than presenting it as reassurance.

At a non-sensitive level, explain how material gaps in identity or background information are handled and how continuing suitability for communal accommodation is assessed. If somebody is unsuitable, who decides on transfer, how quickly can it happen, what alternative provision exists, and what support or safeguards apply while they wait? Incomplete records or vulnerability do not, by themselves, make somebody dangerous.

## 5. Ecology, drainage and a consistent operating plan

[redacted] so I have paid particular attention to water quality and drainage. I am not presenting this as an independent ecological survey or challenging professional advice merely because I dislike the proposal.

The Preliminary Ecological Appraisal identifies seasonal and access limitations and recommends further targeted work. It also says the survey timing did not materially limit broad habitat classification. Both points matter. Its recommendations include dormouse, barn owl, breeding birds, great crested newts, reptiles and invertebrates, with additional bat work where relevant. [11]

Provide a clear schedule showing which recommended surveys are complete, which are necessary before determination, and which can properly be replaced by avoidance, an applicable licensing approach or later verification. Natural England's standing advice generally expects decision-critical species information before permission, but recognises exceptions. A recommendation is neither proof that a species is present nor an automatic reason for refusal. [12]

I recognise Natural England's subsequent advice, recorded in the screening reasons, that the proposal could proceed without damaging Arncott Bridge Meadows SSSI's interest features. Those reasons also describe outstanding foul-water arrangements and later hydraulic design work. Explain the discharge, water-quality and receiving-environment assumptions behind the favourable conclusion and how the final solution will meet them. [8]

Identify the necessary treatment, monitoring, permits, capacity and third-party approvals, and what further assessment will occur if the final design materially departs from those assumptions. This is a request to secure the basis of the advice, not to disregard it.

The utility and drainage documents leave servicing choices and confirmations to resolve. Provide one consistent, phase-by-phase scenario across transport, noise, air quality, ecology and services. It should cover occupied beds, concurrent construction, staff, shuttles, deliveries, any generators and any wastewater tankering. Confirm what must be in place before each phase, and the deliverable alternatives if preferred connections are unavailable. [13] [14]

The published environmental screening assumes permanent operation as a worst case. I do not suggest it assessed only ten years. The issue is whether the eventual design and overlapping construction and occupation remain within the assessed scenario. [8]

## 6. Publication, participation and the current urgency case

Article 9(2) of the 2025 Urgent Applications Procedure Order requires publication as soon as practicable after the relevant agreement-to-determine notice, subject to the sensitive-information provisions. The 20 July letter to Cherwell refers to section 293B(7); September correspondence confirms conformity and acceptance. Please identify the operative section 293B(5) notice, its date and application version, any superseding decision, and the explanation for the interval before publication. [15] [16] [17]

There may be a legitimate explanation. I am asking for the chronology, not asserting that a breach has been proved. Reconcile the differing references and provide the non-sensitive material necessary to understand the process.

Likewise, considering the site earlier does not automatically disprove urgency. However, the original statement uses a summer timetable that now needs updating. Explain the current critical path and what a reasonable further period to resolve these material issues would prevent. [18] [19]

I accept that sensitive security information may lawfully be withheld and that this procedure differs from an ordinary application. Publish usable non-sensitive conclusions where possible. If material evidence is introduced or substantially revised, allow a proportionate opportunity to respond before determination. I am not claiming that the published period is automatically unlawful. [15]

## 7. Safeguards with owners, funding and consequences

Crown land has particular enforcement rules. They do not amount to blanket immunity, but residents should understand how the safeguards will be secured. For each essential obligation, identify the responsible body, funding, delivery trigger, approval, monitoring and available remedy, including any Crown consent required. [20]

Where justified, essential works and services should be prerequisites to occupation or an increase in numbers. Conditions must still meet the proper legal and policy tests; I am not seeking an unlimited veto, operational control of the police or duplication of other regulatory regimes. [21]

**Phasing is only reassuring if there are meaningful conditions for moving to the next phase.** State what must be demonstrated, who checks it, when further admissions can be paused, and how existing occupants remain supported. Report actual performance against the assumptions used to obtain permission, with privacy protection and an accessible complaints route.

For the ten-year use, specify the event starting the period, the end date, cessation and any removal or restoration obligations, and the mechanism for securing compliance. Infrastructure lasting longer does not itself authorise a longer use. [1]

## 8. What I am asking the decision-maker to do

Please address these material issues in the decision record and explain why any conditions or completed agreements provide an adequate solution. My principal objections concern safety, accessibility, services, environmental effects and deliverability. I do not rely on an unproven fall in house prices or private financial loss as a stand-alone ground for refusal.

I am not asking for a guarantee that nothing will go wrong, or for every operational detail to be fixed in advance. I am asking what the assessment is based on, what safeguards will actually be in place, and what happens if the assumptions are wrong.

**If unacceptable impacts cannot be adequately mitigated, refuse permission. If material evidence needed to reach an informed decision is still missing, defer determination until it has been properly considered.** Bicester residents and those who may be accommodated here both deserve workable protections, not promises that cannot be checked.

Yours faithfully,

[redacted]

[redacted]

Please redact any private contact information before publication. The supporting evidence review is an annex to this representation.

## Source notes

Numbered references in the text link directly to the source. Details and locations are set out below. Sources were checked for this final edition on 6 September 2026. Page references described as "printed" may differ from the PDF viewer's page number.

**1.** MOD Bicester Site A: application and representation instructions. MHCLG. Published 2 September 2026; updated 4 September 2026. Proposal, validation, representation period and disclosure notice.

**2.** Planning Proposal Statement. Home Office application attachment, 2026. In particular paragraphs 2.14 and 7.23; health, operational and planning-policy discussion.

**3.** Equality Impact Assessment: MOD Bicester. Home Office application attachment. Sign-off recorded on 28 May 2026; sections on community relations, policing, suitability and support.

**4.** Equality Act 2010, section 149. Legislation.gov.uk. Public Sector Equality Duty; read alongside relevant case law.

**5.** National Planning Policy Framework. MHCLG, 17 August 2026. DP3(2)(f), TR4(1)(c), TR6(2), HC3 and Annex A on implementation.

**6.** Allocation of asylum accommodation policy. Home Office. Version 16.0, published for staff on 29 July 2026. Reinstated protections, ex-MOD accommodation, room-sharing and suitability.

**7.** Large sites for asylum accommodation: support for police forces. Home Office. Current published scheme checked 6 September 2026; sections 1.2, 1.3 and 1.6.

**8.** EIA screening: written statement of reasons. Secretary of State, 26 August 2026. Permanent-operation screening assumption; infrastructure, healthcare and Natural England's August advice, including printed page 11.

**9.** Transport Assessment. Home Office application attachment, 2026. Paragraphs 3.10.2–3.10.7, including the survey beginning 16 April 2026 and unadjusted comparison.

**10.** Travel Plan. Home Office application attachment, 2026. Independent movement, on-site facilities, transport and monitoring arrangements.

**11.** Preliminary Ecological Appraisal. Home Office application attachment, 2026. Section 2.4, printed pages 7–8, and section 5, printed page 33: limitations, conclusions and survey recommendations.

**12.** Protected species and development: advice for local planning authorities. Natural England standing advice, checked 6 September 2026. Necessary survey information, exceptions, avoidance and licensing approaches.

**13.** Utilities and Infrastructure Assessment. Home Office application attachment, 2026. Electricity supply, servicing options and outstanding confirmations.

**14.** Drainage Design Statement. Home Office application attachment, 2026. Foul and surface water, receiving arrangements, next-stage design and approvals.

**15.** Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025. SI 2025/411. In particular articles 6, 9, 10, 11 and 12. In force from 1 May 2025.

**16.** Notification to Cherwell District Council. MHCLG, 20 July 2026. Express reference to TCPA section 293B(7), national importance, urgency and subsequent publication.

**17.** Notification to the applicant. MHCLG, 2 September 2026. Conformity and acceptance correspondence; read alongside the July notification.

**18.** Statement of National Importance and Urgency. Home Office application attachment, 2026. Accommodation need, alternative procedures and original summer programme.

**19.** Crown development: planning practice guidance. MHCLG guidance, checked 6 September 2026. Urgent-route criteria, evidence, procedure and determination.

**20.** Town and Country Planning Act 1990, section 296A. Legislation.gov.uk. Enforcement in relation to the Crown; consent and specified exceptions.

**21.** Use of planning conditions. MHCLG planning practice guidance, checked 6 September 2026. Six tests, later details and relationship with other controls.