From: [redacted]
To: Crown Casework
Subject: PCU/RARE/C3105/3378843 - objection letter
Date: 10 September 2026 21:04:27

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Thursday 10th September 2026

Dear Sir/Madam,

RE: Application reference: PCU/RARE/C3105/3378843

I am writing to object to the proposed development at Site A, MOD Bicester. This process has been handled using a fast-track 'urgent crown development' procedure. Something only used for a national emergency. This has meant that neither the villagers, the wider community of Piddington, other local villages or has Cherwell District Council have been consulted. We knew nothing about this until it was publicly announced. With national expenditure on asylum accommodation falling, how can this be considered a national emergency? In the application there are twelve paragraphs with heavily redacted sections. What information are they not giving us access to?

My principal concerns relate to the ecological value and incomplete assessment of the site, the significant lack of confirmed infrastructure capacity, the unresolved requirements for water, sewage and electricity, and the associated financial and environmental implications. I am also concerned that the flood risk associated with the site has not been adequately addressed.

Ecology, Bats and Biodiversity

The ecological implications of developing this site at the proposed scale requires much greater consideration. Four species of bats have been identified at Site A: Barbastelle (rare), Noctule, Pipistrelle 45, and Long-Eared bats. Under English law It is an offence to deliberately kill, injure, capture or disturb bats, and to damage or destroy their breeding sites or resting places. Protection can apply even when bats are not actually present at the time work takes place

Local wildlife records identify 10 UK Red List birds including: Nightingales recorded

singing and breeding for three consecutive years, Swift, Cuckoo, Woodcock, Greenfinch, Starling and Linnet. There are a further 14 Amber List species; breeding Barn Owls; seven species of migratory warbler, The applicant's own Preliminary Ecological Appraisal states that it cannot be considered a comprehensive assessment, with a number of protected species surveys still outstanding. The fieldwork was undertaken between March 26th and April - not the optimum survey periods, with some buildings not adequately looked at and some areas ignored.

The site therefore provides an important habitat for legally protected mammals, and any assessment of the proposal needs to properly consider how construction and subsequent occupation could affect these species, surveys that must be conducted, published and independently scrutinised before any planning is considered.

Bats are particularly sensitive to changes in their environment. The introduction of increased artificial lighting, noise, traffic and vibration, together with changes to vegetation, buildings, access routes and drainage, could alter established feeding, commuting and roosting patterns. Increased lighting in particular has the potential to fragment dark flight routes and make previously suitable areas less attractive or accessible to bats.

My concern is therefore not simply the physical loss of habitat. Changing the character of the site and the conditions within it could alter the ecological functionality of the habitat that currently supports these species. Increased vehicle movements, human activity, lighting and noise could create a substantially different environment from that which exists today.

This is especially important given that the applicant's ecological assessment is itself acknowledged to be incomplete and that protected species surveys remain outstanding. It is difficult to understand how the full impact of the development can be properly assessed, mitigated or avoided until those surveys have been completed.

The potential cumulative effects should also be considered. The combination of construction activity, permanent lighting, increased traffic, noise, vibration and changes to habitat and drainage could have a greater impact than any individual factor considered in isolation.

I therefore ask that no decision should be made until comprehensive protected species surveys, including a full assessment of the bat populations and their use of the site, have been completed. The development should demonstrate that important bat habitats and ecological corridors can be retained and protected, and that any proposed lighting, traffic, construction and drainage arrangements will not cause unacceptable harm to these protected species.

The absence of a Biodiversity Net Gain assessment further adds to these concerns. The ecological value of this site should be properly established before any decision is taken that could result in permanent alteration, loss of habitat and further decline of

already endangered and protected species.

Water, Sewage and Drainage Infrastructure

I have significant concerns about whether the existing infrastructure is capable of supporting a development of this scale.

The nearest wastewater treatment works, Bicester WwTW, currently serves a population equivalent of approximately 40,436 and has an upgraded design capacity of around 67,840. However, the applicant's own Utilities and Infrastructure Assessment states that potential capacity requires confirmation, including confirmation of permit compliance. There is currently no on-site wastewater treatment plant, while the proposed foul drainage strategy remains provisional and is dependent on further surveys and stakeholder engagement.

Most significantly, there appears to be no written confirmation from Thames Water that the existing network can accommodate the additional demand generated by this development. This is not a minor technical matter. A development accommodating more than a thousand people would inevitably create substantial additional demand for water supply, foul drainage and wastewater treatment.

The application also leaves the long-term foul and surface water drainage solutions to be resolved after permission is granted. Our village already suffers from low water pressure most evenings.

In my view, the necessary infrastructure should be demonstrated as available, deliverable and adequately funded before planning permission is granted, rather than relying upon future investigations and agreements.

Electricity and Utilities

I have similar concerns about electricity provision.

The applicant's own assessment states that the condition, capacity and configuration of the electrical network are currently unknown, and that the capacity of the primary intake has not been verified. Despite this uncertainty, the proposal anticipates an estimated maximum demand of approximately 2.16 MVA and proposes reliance on temporary and permanent generators rather than a confirmed grid connection.

There is also no proposed gas supply, meaning that heating, hot water and cooking for more than a thousand people would depend upon this already uncertain electricity provision.

The only correspondence with the network operator included in the application is an automated asset-protection response which expressly does not constitute a formal agreement or consent.

I ask that questions about the cost, practicality, reliability and environmental consequences of providing the necessary electricity infrastructure be answered prior to planning being given. If significant new infrastructure, generators, connections or upgrades are required, the full cost, feasibility and responsibility for delivering these works should be clearly established before the development is approved.

Financial and Infrastructure Implications

The infrastructure concerns should not be considered in isolation. A development of this scale requires substantial investment in water, sewage, electricity, drainage, access and other essential services.

At present, key elements of this infrastructure remain uncertain or provisional. The application leaves matters including the long-term power supply and foul and surface water drainage to be resolved following any planning permission.

There should therefore be a clear and transparent assessment of what infrastructure is required, who will provide it, how it will be funded, and whether it can realistically be delivered within the necessary timescale. The cost of providing or upgrading infrastructure should not simply be assumed away because the development is considered nationally important.

I am particularly concerned that approving the development before these matters have been properly established could result in significant additional public expenditure or leave essential infrastructure dependent upon future agreements that are not currently secured.

Flood Risk

Flood risk is another significant concern. The village experiences regular flooding due to its topographical ‘run off’ effect, the inability of the Piddington Brook to cope with the volume of water during heavy downpours and storms. Certain parts of the village are inaccessible during adverse weather conditions. Roads and lanes leading to, adjacent to or parallel to Site A (B4011, Widnell Lane, Lower End) become treacherous to drive through, especially at night where there are no pavements and no street lighting. High risk for both driver and pedestrian.

The applicant's own Flood Risk Assessment records that approximately a quarter of the site has a high chance of surface water flooding in any given year, with additional areas identified as being at medium and low risk.

I am concerned because the Environment Agency's standard surface water modelling used in the assessment does not take account of the site's private drainage ditches and pipework. The condition of this existing drainage infrastructure has not been surveyed. At the same time, the drainage strategy required to manage the identified flood risk had not been finalised when the Flood Risk Assessment was

submitted.

This creates an obvious concern about whether the existing drainage system can safely accommodate the development and whether construction could increase surface water run-off or transfer flood risk elsewhere.

Given that a substantial proportion of the site is already identified as being at high risk of surface water flooding, I believe the complete drainage strategy, including detailed modelling of existing drainage infrastructure and the impact of the proposed development, should be available and independently scrutinised before any decision is made.

I conclude by stating that these issues demonstrate that the proposal has not yet established a sufficiently robust understanding of the site's environmental constraints or the infrastructure required to support a development of this scale.

In particular:

- the ecological assessment is expressly incomplete and protected species surveys, especially the presence of bats, remain outstanding;
- no Biodiversity Net Gain assessment appears to have been provided;
- wastewater capacity has not been confirmed;
- the foul drainage strategy remains provisional;
- there is no evidence of a confirmed Thames Water agreement for the additional demand;
- the capacity of the electricity supply remains unknown;
- the proposed electricity demand is substantial and would initially rely upon generators;
- long-term power and drainage arrangements remain unresolved;
- the financial responsibility and costs associated with providing the required infrastructure need to be clearly established; and
- approximately a quarter of the site is identified as having a high chance of surface water flooding, while the existing private drainage infrastructure has not been adequately surveyed.

These are fundamental matters of deliverability, environmental protection and public safety. These are not details that should be left to be resolved after planning permission has been granted. I therefore respectfully request that the application be refused, or at the very least deferred until the outstanding ecological surveys, biodiversity assessment, infrastructure capacity assessments, detailed drainage strategy and associated delivery and funding arrangements have been completed and made available for proper public and planning scrutiny.

Yours faithfully,

Mrs S.J. Phillips