REPRESENTATION TO THE SECRETARY OF STATE FOR HOUSING, COMMUNITIES AND LOCAL GOVERNMENT

Urgent Crown Development Application — MOD Bicester (Site A), Bicester Garrison, Launton Road, Oxfordshire OX25 1AE

Application reference: PCU/RARE/C3105/3378843

Applicant: The Home Office | Decision-maker: Secretary of State (MHCLG Crown Casework) | Representation period: 07/09/2026 – 17/09/2026

From	Nikki Evans, [redacted]
Capacity	Local resident [redacted]. I work at director level in the civil engineering and utilities infrastructure sector and comment on infrastructure matters from that professional standpoint. This representation is made in a personal capacity.
Position	**OBJECTION. The application should be refused. If the Secretary of State is nonetheless minded to grant, permission should be subject to the conditions and obligations set out in Section 7.**
Date	10/09/2026
Sent to	Crowncasework@communities.gov.uk (copy: bicester.garrison@cherwell-dc.gov.uk; Calum Miller MP)

1. Executive summary

I object to the grant of planning permission for the temporary (ten-year) change of use of MOD Bicester Site A to non-detained asylum accommodation for up to 1,256 single adult men. My objection is not to the principle of accommodating people seeking asylum; it is that this site, at this scale, on this timetable, cannot be served by the infrastructure that exists, and the application does not demonstrate that the infrastructure that would be needed can be delivered, consented and funded before occupation.

The grounds are, in summary:

1. **Utilities.** The site has no accommodation history and the applicant's own scheme includes a new on-site wastewater treatment plant, which is itself an admission that the public sewerage network cannot serve a population of 1,256 plus staff. Potable water, foul drainage, electricity and fire-water capacity for a settlement larger than Piddington and Upper Arncott combined have not been demonstrated as available, consented or funded, and the condition of the site's legacy private MoD networks — which on an estate of this age are unlikely to be fit for a resident population — has not been disclosed.
2. **Transport and highway safety.** The applicant's Transport Assessment concedes the site is "not ideal" for sustainable travel, with limited footways, lighting and public transport. Up to 1,256 residents without private vehicles will generate pedestrian movements on unlit rural roads. The site is isolated from Bicester and its services.
3. **Health services at capacity.** Bicester's GP practices are absorbing one of the fastest housing growth rates in England; Healthwatch Oxfordshire found only 6 of 76 dental practices (7.9%) in the county accepting new adult NHS patients. The factsheet says health provision will be "determined in discussion with health partners" — it is not committed, designed or funded.
4. **Policing and emergency services.** The Thames Valley Police and Crime Commissioner has confirmed no prior engagement and identified an additional policing burden, including protest policing, against a backdrop of officer shortages. No funding mechanism is identified. Absent a Home Office funding guarantee, the cost falls to the police precept on council tax and to local authority budgets.

5. **Welfare of the men accommodated.** The evidence from RAF Wethersfield — the direct precedent for this model — is unambiguous: a High Court finding of unlawfulness (TG & Ors v SSHD, 14/03/2025), an ICIBI inspection (October 2024) recording safeguarding, health-and-safety and data failures, and 393 safeguarding referrals in a single quarter for around 600 men, including 35 for suicide or self-harm and 141 for missing persons. Replicating that model at double the scale, in a more isolated location, is not a welfare-neutral choice.
6. **Community and socio-economic impact.** Piddington has c. 358 residents and Upper Arncott c. 1,700. Placing a facility of 1,256 between them for a decade is a change in the character of the locality of a wholly different order from anything the Development Plan anticipates, with foreseeable effects on community cohesion, the local housing market and the deliverability of Bicester Garden Town.
7. **Value for money and the 'national importance' and 'urgency' tests.** The National Audit Office found the large-sites programme would cost £46m more than hotels, with the Infrastructure and Projects Authority rating it 'red' three times. Wethersfield cost over £30m a year for c. 600 men. Urgency generated by the applicant's own programme is not the same as urgency in the public interest.
8. **Planning history.** This site has been through this process before. In 2003 an Inspector, after a three-month inquiry into a 750-place Home Office accommodation centre on the same land, recommended refusal on grounds of unsustainable rural location and a "very real, practical worry" about pedestrian road safety. The Secretary of State overrode him on the basis that the centre would be self-sufficient, then cancelled the project in June 2005 having spent c. £28m. The current proposal is two-thirds larger, on the same roads, with a thinner service model, and the applicant has not engaged with the Inspector's findings.
9. **Process.** An eleven-day non-statutory window of which residents were never directly notified — the decision-maker's own page still gives no dates and people are learning of it through social media — documents withheld as 'sensitive' under s293B(11), an EIA screening-out for a settlement of 1,256 with its own treatment works, and — given the Wethersfield PSED finding — an Equalities Impact Assessment that must be scrutinised, not assumed.

Requested outcome: refusal. In the alternative, the conditions and obligations at Section 7 are the minimum necessary to make the development acceptable in planning terms. Their common principle is that occupation must be gated to demonstrated infrastructure capacity — not promised, not 'in discussion', but consented, built and funded — and that the costs of serving the site are borne by the applicant, not by Oxfordshire's council-tax payers.

2. What the application actually commits to

It is important to test the proposal against what the applicant has committed to in the published documents, rather than against reassurances offered in the press. The published material (GOV.UK factsheet, 30/06/2026; Urgent Crown Development page; Cherwell District Council summary) states:

- Full planning permission is sought for a temporary change of use of the former defence storage and distribution centre to non-detained asylum accommodation for a period of ten years, retaining Building A6, demolishing other structures and erecting modular accommodation for up to 1,256 service users, together with health facilities, staff accommodation, wastewater treatment, security infrastructure and recreational areas.
- The intended cohort is single adult males aged 18–65. Occupation would be phased, "starting with smaller numbers at first", but no ceiling below 1,256 and no infrastructure trigger for each phase is offered.
- Health care provision is to be "determined in discussion with health partners". It is not specified, costed or committed.

- Security comprises a 24/7 specialist provider, CCTV and sign-in/sign-out at the gate. Residents are free to leave. The site is expressly non-detained.
- The site is to be "largely self-sufficient to minimise any impact on the local community" — a stated aim, not a measured outcome, with no definition of 'largely'.
- The Secretary of State's letter of 20/07/2026 accepted the 'national importance' and 'urgency' tests. Acceptance into the urgent route does not decide the planning merits, and the applicant's own urgency justification is programme-driven: the standard Crown route "would delay to 2027".
- The applicant's own Unexploded Ordnance Risk Assessment, published in the application bundle, is written for "accommodation for 3,510 service users". The Home Office has said publicly that this is an outdated third-party estimate and that 1,256 is the figure sought. The document nonetheless demonstrates that the scheme has been designed and assessed, at some stage, at nearly three times the capacity now applied for, and that the applicant's stated capacity is a programme choice rather than a physical limit of the site. Wethersfield's permitted capacity was raised from 800 to 1,245 within two years of opening.
- Eleven sections of the application have been redacted from the published version, including the applicant's suicide and self-harm prevention measures, health and safety protocols and death management procedures — precisely the welfare material on which the Wethersfield evidence bears most directly.
- The EIA screening direction of 26/08/2026 concluded EIA was not required. Certain documents have been directed 'sensitive' and withheld from public inspection.

Three points follow. First, the application relies on future discussions with third parties (NHS, Thames Water, Thames Valley Police) to supply the very things that make a site of this kind acceptable. Second, the applicant is asking for a ten-year permission for a population greater than either adjacent village while calling the use 'temporary'. In infrastructure terms a decade is not temporary: the assets needed to serve 1,256 people — treatment plant, water main reinforcement, power supply — are permanent works with permanent environmental consequences. Third, the cohort, scale and model are materially identical to RAF Wethersfield, and the Secretary of State has the benefit of three years of evidence on how that model has performed.

3. Grounds of objection

3.1 Utilities and physical infrastructure (Ground 1)

Site A was a defence storage and distribution centre. It has never accommodated a resident population. Calum Miller MP has stated publicly that the site "has no safe transport, no water supply, no electricity or gas" adequate to the proposed use. The applicant's response is a Utilities and Infrastructure Assessment and the inclusion in the description of development of a wastewater treatment facility. I make the following points from a professional infrastructure perspective.

Foul drainage. A resident population of 1,256 plus round-the-clock staff represents a population equivalent well in excess of Piddington and comparable to the whole of Upper Arncott. Thames Water is the statutory sewerage undertaker. The fact that the applicant proposes its own treatment works is the clearest possible indication that the existing network and receiving treatment works do not have headroom for a connection of this size, or that reinforcement could not be delivered on the applicant's timetable. A private treatment works serving 1,256 people requires an Environmental Permit from the Environment Agency, a consented discharge point and receiving watercourse with demonstrated dilution and water-quality capacity, sludge handling and off-site tankering, an operator with statutory competence, and a long-term maintenance and monitoring regime. None of this is a matter of routine; it is a permanent piece of environmental infrastructure being introduced to a rural catchment under a 'temporary' permission. The Secretary of State should require the Environment Agency's and Thames

Water's written positions to be published before determination, and should not accept a Grampian-style promise that a permit 'will be sought'.

Potable water. Peak potable demand for 1,256 residents and staff, together with the fire-fighting flows required for modular accommodation blocks and a retained large warehouse, must be demonstrated against the local distribution network's capacity. Thames Water's Bicester network has been reinforced over recent years to serve Garden Town growth that was planned, phased and funded through the Local Plan process; this proposal was not part of that planning. If mains reinforcement is needed, the application should identify the works, their consenting route, programme and who pays. If storage and pumping are proposed on site, the Fire Strategy Report should be read alongside the utilities assessment to confirm that fire-water supplies are adequate — the ICIBI found legionella in the water systems at Wethersfield and the Bibby Stockholm, which is exactly the risk created by hastily commissioned water infrastructure.

Electricity and heat. Modular accommodation for 1,256 people, with electric heating, catering, laundry, healthcare and security systems, is a substantial new connected load in a rural area. The Distribution Network Operator's capacity position, any primary substation reinforcement, and the programme for a new connection are material to whether the site can open in 'late 2026 or early 2027' at all. Reliance on diesel generation as a bridging measure would carry its own air-quality and noise consequences which the screening notes do not appear to have assessed.

Legacy private networks on the site. Defence estate sites of this age are not normally served plot-by-plot by the statutory undertakers. They are typically served by private networks owned and maintained by the Defence Infrastructure Organisation — a private water distribution network fed from a bulk supply point, private foul and surface-water sewers, a private high-voltage electrical network with MoD-owned substations and switchgear, and private fire mains — much of it laid for the site's original wartime and Cold War storage function and never designed for a resident population. This is not speculation about MOD Bicester specifically. The Ministry of Defence's own utilities baseline for the garrison, prepared for the Future Defence Storage and Redistribution Programme and lodged on Cherwell's planning register, recorded that the garrison's water is supplied through a private network fed from four interconnected service reservoirs on Arncott Hill, operated for the MoD by Kelda Water Services, and that the network was experiencing "significant leakage" requiring upgrades; that there was no public gas connection, the site relying on LPG and oil; and that the contracted electricity supply was 5.2 MVA with only c. 1.2 MVA uncontracted headroom, with reinforcement "likely needed". That assessment is now some sixteen years old. Nothing has been published to show that the deficiencies it recorded were remedied, and the same reservoirs and distribution network would presumably be relied upon to serve 1,256 residents. Beyond that MoD evidence I make no assertion about the present condition of the networks at Site A, because the applicant has not published it; that is the point. The Secretary of State should require the Utilities and Infrastructure Assessment to disclose, for each network: ownership and the point of demarcation with the statutory undertaker; date of installation and material (asbestos-cement and cast-iron water mains, lead communication pipes and oil-filled or pre-1980 switchgear are all foreseeable on an estate of this age); CCTV and condition survey results for the sewers; pressure and flow test results for water and fire mains; any water-quality and legionella risk assessment for a network that has been lightly loaded or dormant; and a statement of whether the undertakers will adopt the assets, and if not who will operate them to statutory standards for ten years. If, as is likely, the answer is that substantial renewal is required, that renewal is a permanent infrastructure project in its own right — with excavation on a site the applicant's own documents identify as carrying unexploded-ordnance and geo-environmental risk — and its programme sits directly on the critical path to the applicant's 'late 2026 or early 2027' opening.

Asbestos and demolition. The description of development includes demolition of existing structures and the retention and refurbishment of Building A6 for residential use. Defence storage and distribution buildings of this era were routinely constructed and later maintained with asbestos-containing materials — asbestos-cement roofing and cladding sheets, insulating board in offices and

plant rooms, pipe lagging, gaskets and floor tiles — and the probability that a site of this age and function contains such materials is high rather than speculative. Under the Control of Asbestos Regulations 2012 no demolition or refurbishment can lawfully proceed without a refurbishment and demolition survey of every affected building, and any licensable removal must be notified to the Health and Safety Executive and carried out by a licensed contractor before other works begin. The application should therefore disclose whether refurbishment and demolition surveys have been carried out, their findings, the removal strategy and its programme, and how contaminated demolition arisings will be handled on a site where the applicant's own documents already identify unexploded-ordnance and geo-environmental risk. Buried asbestos-containing material is a common finding on former defence land where earlier demolitions were disposed of on site; the Preliminary Geo-Environmental Assessment should be published in full so that the presence or absence of such material can be tested. None of this is a bar to development in principle. It is a matter of the health of the workforce and the future residents, of the duration and cost of the enabling works, and of whether the 'late 2026 or early 2027' opening on which the urgency case rests is achievable at all.

Who pays and for how long. Every one of these works is a permanent asset with a permanent operating cost. The application should state plainly whether the Home Office will fund reinforcement in full, whether any of it will be recovered through Thames Water's or the DNO's customer base (i.e. by local bill-payers), and what happens to the assets at the end of the ten-year period. 'Temporary' should mean a decommissioning and restoration obligation, secured by condition.

3.2 Transport, access and highway safety (Ground 2)

The applicant's own Transport Assessment concedes the site is "not ideal" for sustainable travel, that footways, lighting and public transport are limited, and that historic planning evidence for the site raised "pedestrian safety and the isolated nature of the location". That candour should be given weight. Residents will not have cars. The realistic pattern of movement — established at Wethersfield and Napier — is that men walk to the nearest settlement and bus stop regardless of shuttle timetables, along roads with no footway or street lighting. Piddington and Upper Arncott are villages, not service centres; Bicester's services are several miles away. The Wethersfield safeguarding data (141 missing-person referrals in one quarter) is relevant here: it shows the volume of unplanned off-site movement a facility of this type generates.

The Assessment should be tested on: predicted daily pedestrian and cycle movements at full occupancy; the safety of the routes to Bicester, Ambrosden and Arncott at night; the capacity, frequency and funding term of any dedicated shuttle; HGV and service vehicle movements during the construction and demolition phase on rural roads; and the highway authority's (Oxfordshire County Council's) formal position, which should be published before determination.

3.3 Health services at capacity (Ground 3)

Bicester is delivering some of the highest housing growth in the country through the Garden Town programme. That growth was planned with matching health infrastructure contributions negotiated over years. Local GP practices are absorbing that growth now; residents in Bicester routinely report difficulty obtaining appointments. Introducing 1,256 adult men — a cohort with well-documented and above-average needs for primary care, mental health support, and treatment for the physical consequences of displacement and dangerous journeys — into that system without a committed, funded, on-site primary care model would be irresponsible to both the men and the existing population.

Dental access is worse. Healthwatch Oxfordshire's survey (March 2024) found only 6 of 76 practices in the county — 7.9% — accepting new adult NHS patients. There is no realistic prospect of 1,256 additional adults obtaining NHS dental care locally. The applicant's answer — that health provision will be "determined in discussion with health partners" — is not a commitment. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board should be required to set out, before

determination, what primary care, dental, pharmacy and mental health provision will be on site, who will staff it, who will fund it and for how long.

Mental health deserves particular emphasis. At Wethersfield, MSF described the site as "A Lonely Place" and the Helen Bamber Foundation recorded 35 suicide or self-harm safeguarding referrals in a single quarter. Oxford Health's community mental health services and the ambulance service will bear the acute consequences of any repetition here. That is an infrastructure question, not merely a humanitarian one.

3.4 Policing, fire and emergency services — and who pays (Ground 4)

The Thames Valley Police and Crime Commissioner has stated that he had "no direct communication from the Home Office" before the announcement, that the facility will place an "additional burden" on local policing amid funding reductions and officer shortages, and that he has "significant concerns about the implications of policing potential protests at the site". Protest activity is already established locally (a demonstration in August and a march on 05/09/2026). Bicester's neighbourhood policing footprint is sized for a market town and its villages; the operational demand generated by a 1,256-person facility, its visitors, its protests and its counter-protests is a different scale of commitment, sustained for ten years.

Neither Oxfordshire Fire and Rescue Service nor South Central Ambulance Service has published any position on the proposal. The fire authority is a consultee on the applicant's Fire Strategy Report; the ambulance service will carry the acute mental and physical health demand that the Wethersfield data shows a facility of this type generates, into a rural response area some distance from the nearest emergency department. The Secretary of State should require both services' written responses to be obtained and published before determination. Fire safety warrants particular care here: the scheme retains Building A6, a large former defence storage warehouse, alongside modular accommodation for up to 1,256 people. Oxfordshire Fire and Rescue Service lost two firefighters, with a member of the public, in the collapse of a large former military hangar during the Bicester Motion fire in May 2025. I draw no analogy between the two buildings; the point is that the fire authority's assessment of a large legacy defence structure re-purposed for residential use, its water supplies and its access, should be independently reviewed and published, not left to a report the public cannot see.

The funding question is the one the application avoids. Policing in the Thames Valley is funded by central grant and by the police precept on council tax. Cherwell District Council and Oxfordshire County Council are funded by grant and council tax. Oxfordshire Fire and Rescue must plan for a large residential facility in a rural response area. Unless the Home Office enters into a binding funding agreement covering the additional costs to the PCC, the two councils, the ICB and the fire service for the full ten years, those costs will fall on Oxfordshire's council-tax payers. The Secretary of State should require that agreement to be in place, and published, before any occupation. Ad hoc grants of the kind offered to other host authorities are not a substitute for an enforceable obligation with an index-linked base and a mechanism for review.

3.5 Welfare of the men to be accommodated (Ground 5)

A planning decision-maker must consider the living conditions of future occupiers. The Secretary of State does not need to speculate about how this model performs; the evidence from RAF Wethersfield is extensive and recent:

- *TG & Ors v Secretary of State for the Home Department* (Mould J, 14/03/2025): the Home Secretary acted unlawfully in accommodating three men at Wethersfield, ignoring credible evidence of trafficking and mental-health deterioration, and breached the Public Sector Equality Duty by failing to assess equality impacts when amending the accommodation policy — a failure described as "a most serious and inexplicable omission". Over 236 people were transferred out following pre-action letters. Staff lacked safeguarding training.

- ICIBI, An inspection of contingency asylum accommodation (published 29/10/2024): specific health and safety risks including legionella; violence and disorder with inadequate record-keeping; no on-site staff able to give residents any information about their claims; Home Office data "not fit for purpose"; "insufficient stakeholder engagement" and "one-way" communication with partners.
- Helen Bamber Foundation (June 2025): 393 safeguarding referrals in the first quarter of 2025 for c. 600 men — 35 suicide/self-harm, 90 violent or disruptive behaviour, 141 missing, 51 torture or trafficking indicators; a "legal advice desert"; and an annual cost exceeding £30m.
- MSF, "A Lonely Place" (May 2025), documenting the harm caused by isolation, lack of privacy and inadequate access to healthcare and legal advice.

The applicant's factsheet says men assessed as unsuitable will be moved elsewhere. Wethersfield had the same policy; the High Court found it was not applied. Isolation, scale and a single-sex adult cohort are structural features of the model, not teething problems. Bicester Site A proposes the same model at a larger scale in a more isolated location. The mitigation that would materially change outcomes — an occupancy cap far below 1,256, a maximum length of stay, on-site healthcare and legal access, and an independent monitoring regime with published data — is absent from the application and must be secured by condition if permission is granted at all.

3.6 Community, socio-economic and housing-market impacts (Ground 6)

Piddington has around 358 residents; Upper Arncott around 1,700. The proposal introduces a settlement of 1,256 adult men between them for ten years. That is not an incremental change in the character of the area; it is a change of kind. Community cohesion is a stated Home Office priority in its own written statement of 29/06/2026 and is therefore a legitimate matter for the Secretary of State to weigh. The record at Wethersfield — sustained protest, a neighbouring council spending £150,000 on private security in surrounding areas, and a Council Leader stating that a rural disused airbase "does not have the infrastructure to host asylum seekers on such a large scale" — is the realistic comparator.

On property values, I acknowledge that the effect of a development on the value of neighbouring property is not, in itself, a material planning consideration, and I do not ask the Secretary of State to treat it as one. But the underlying causes of any such effect — loss of amenity, perceived and actual safety, traffic and noise, the stigmatising of two villages for a decade — are material, and the housing-market response is the measurable evidence that those effects are real. Residents who need to sell during the ten-year period, whether for work, family or age, will bear a direct financial consequence of a decision taken without their participation. That is a fairness point the Secretary of State is entitled to weigh, and it is a further reason why the ten-year term should be treated as the maximum and secured by an absolute cessation condition.

There is also a plan-led point. Bicester Garden Town is a long-planned, infrastructure-led growth programme delivered through the adopted Cherwell Local Plan. This proposal sits entirely outside that framework, competes for the same utility, health and highway capacity, and was not assessed in any Local Plan evidence base. Granting it risks displacing infrastructure headroom earmarked for planned homes.

3.7 Value for money, 'national importance' and 'urgency' (Ground 7)

The Secretary of State has accepted that the proposal is of national importance and urgent for the purposes of s293B. Acceptance does not decide the merits, and the weight given to the public benefit should reflect the evidence on whether the benefit is real. The National Audit Office (March 2024) found the large-sites programme, originally forecast to save £94m against hotels, would instead cost £46m more; the Infrastructure and Projects Authority rated it 'red' at three successive reviews; Wethersfield housed 576 people against a planned 1,445. Wethersfield's running cost exceeded

£30m a year for c. 600 men. If the public benefit relied on is cost saving and hotel exit, the Secretary of State should require the applicant to publish its cost-per-person comparison for this site against dispersal accommodation, including the utilities, transport, health, policing and security costs identified above. Urgency created by the applicant's own delivery programme — "the standard Crown route would delay to 2027" — is not urgency in the public interest, and should not be permitted to compress the scrutiny that a permanent 1,256-person settlement would otherwise receive.

The MoD garrison adjacent to Site A remains operational, home to several hundred service personnel and civilian staff. The security and operational implications of a non-detained facility of this size alongside a working defence logistics site do not appear to have been addressed in the public documents.

3.8 Planning history: the 2002–2005 Bicester Accommodation Centre (Ground 8)

The applicant's Transport Assessment refers to "historical planning evidence" raising pedestrian safety and isolation concerns. That reference understates the position. The Secretary of State should have the full history before him, because it is directly on point and it comes from his own department's records.

- In 2002 the Home Office applied in outline for a 750-person Accommodation Centre on land at DSDC Bicester — the same landholding now proposed — under the accommodation-centre provisions of the Nationality, Immigration and Asylum Act 2002. Cherwell District Council refused. The application was called in and a public inquiry sat from 10/12/2002 to 03/03/2003.
- The Inspector's report (18/04/2003) recommended refusal. He found that greater weight should be attached to the factors against the proposal than for it in terms of sustainable development; that the necessity and benefits of a rural location had not been convincingly demonstrated and the site appeared to have been chosen because it was available government land rather than because it was suitable; and that the risk of pedestrian asylum seekers being involved in traffic accidents was "a very real, practical worry" to which the Home Office had given insufficient attention.
- The First Secretary of State nonetheless granted permission on 18/08/2003, relying on national policy need for a trial of centres in non-urban locations, the brownfield status of the land, an assessment that impact on local services would be modest, and — critically — a commitment that the centre would be large enough to be self-sufficient, secured by a s299A planning obligation to which Cherwell District Council, Oxfordshire County Council, the Secretary of State for Defence and the Home Secretary were all parties (14/04/2003). Cherwell's judicial review was dismissed: R (Cherwell District Council) v First Secretary of State [2004] EWHC 724 (Admin), Collins J, 06/04/2004.
- The project was cancelled in June 2005. The National Audit Office's report Home Office: The cancellation of Bicester Accommodation Centre found that approximately £28m had been spent before cancellation; that the start on site had slipped by fourteen months because of local opposition and the planning process; and that the project ceased to be economically viable when asylum applications halved and costs rose. The NAO's lesson was that departments should assess the cost impact of planning delay across multiple demand scenarios before committing.

Four consequences follow for the present application. First, the Inspector's findings on isolation and pedestrian road safety were made about the same land and the same rural road network at a scale of 750; nothing in the road network has changed to make 1,256 acceptable where 750 was found to be a real and practical danger. The applicant should be required to explain, by reference to the 2003 Inspector's report, what has changed. Second, the 2003 permission was only granted on the footing of a statutory accommodation-centre model with comprehensive on-site services (healthcare, education, legal advice, interpretation) secured by a binding multi-party obligation. The present

application offers a 'basic' facility with health provision 'to be determined' and no obligation at all. The 2003 decision is therefore authority against this application, not for it. Third, the 2005 cancellation shows that the demand assumptions on which large-site programmes are built change faster than the sites can be delivered — the same finding the NAO made again in 2024 about Wethersfield, Scampton and the Bibby Stockholm — and that a ten-year commitment is not a rational response to what the applicant itself describes as 'fluctuating demand'. Fourth, the Secretary of State should weigh that the public purse has already written off £28m on this idea at this location, and that the risk of repeating that outcome is the risk the NAO told the department to plan for.

3.9 Process and adequacy of the evidence base (Ground 9)

- The urgent Crown development route under ss293B–293C does not dispense with the need for planning permission, and this representation does not suggest otherwise; but it does remove the local planning authority as decision-maker, the statutory 21-day consultation, determination by an elected committee and any right of appeal. The only remedy after the decision is judicial review. Where Parliament has removed those safeguards on grounds of urgency, the Secretary of State should hold herself to a correspondingly higher standard in the adequacy of the evidence she requires, the disclosure she permits and the reasons she gives — particularly as the 'urgency' accepted on 20/07/2026 rests on the applicant's own programme rather than on any external event. It is also relevant that the applicant's previous large sites at Wethersfield and Scampton proceeded under emergency permitted development rights and a Special Development Order; the choice to use the urgent Crown route here, rather than a standard Crown application to an Inspector, is the applicant's choice, and the months it saves should be weighed against a ten-year permission.
- The Government's response of 09/09/2026 to Parliamentary petition 777752 (20,974 signatures) states that large sites "will continue to be progressed in consultation with local authorities and statutory partners" through "established multi-agency forums". That statement is contradicted by the record: Cherwell District Council was informed one day before the announcement; the Thames Valley PCC had "no direct communication"; and the response does not mention residents at all. The Secretary of State should not accept the applicant's account of its engagement at face value.
- Cherwell District Council's planning officers stated on 09/09/2026 that they are "currently likely to raise an objection or holding objection" on traffic and highway safety, the rural and isolated location, transport arrangements, and impact on Piddington and Upper Arncott — the same grounds the Inspector upheld in 2003.
- An eleven-day, non-statutory representation period for a ten-year permission affecting 3,000 notified addresses is inadequate, and the consultation exists only because the local MP pressed for it. Cherwell District Council has recorded that it learned of the proposal hours before the announcement and has asked for "meaningful community engagement".
- Residents have not been directly notified of the representation period at all. The application bundle records notification letters to the MP and to the local planning authority only. The Secretary of State's own GOV.UK application page, published 02/09/2026, still states that "the representation period will be confirmed in due course" and gives no dates; the 7–17 September window has reached the public only through the MP, the district council's website and social media. The one letter residents have received was Cherwell District Council's own mailing to some 3,000 addresses on 01/07/2026, which concerned the Home Office's announcement, not this application or how to respond to it. For a ten-year, 1,256-person development — larger than either adjacent village — the ordinary expectation under a conventional application would be neighbour notification by letter and site notices at the very least. Whatever the minimum the 2025 Procedure Order requires of the applicant, a decision-maker relying on an eleven-day window in lieu of statutory consultation cannot rationally treat that window as adequate when

the people affected were not told it was open. The Secretary of State should extend the period and require the applicant to notify every household in Piddington, Arncott, Ambrosden, Blackthorn and Bicester by letter before it closes.

- Documents have been withheld under s293B(11). The public cannot test the utilities, security or transport evidence in full. Where evidence is withheld, the Secretary of State should give correspondingly less weight to the applicant's untestable assertions and correspondingly more to the concerns of statutory consultees.
- No MoD or Defence Infrastructure Organisation inspection, condition survey or disposal appraisal of Site A appears to have been published in the last five years; the only recent defence-estate activity at Bicester on the public record concerns C Site and Graven Hill. The applicant's Utilities and Infrastructure Assessment and Preliminary Geo-Environmental Assessment must therefore rest either on the MoD's legacy records or on the Home Office's own 2026 feasibility work, and it is not disclosed which. The Secretary of State should require the applicant to state the date, scope and method (desk study, walkover or intrusive) of every survey and site inspection underpinning those assessments, and to release from the 'sensitive' direction those parts of the documents that concern utilities and ground condition rather than security, so that the statutory undertakers, the Environment Agency and the public can test them.
- The EIA screening direction (26/08/2026) concluded EIA was not required for a settlement of 1,256 with a new wastewater treatment works discharging to a rural catchment, on a site with unexploded-ordnance and geo-environmental risk. That conclusion should be revisited; at minimum, the cumulative effects with Garden Town growth should have been assessed.
- Given the High Court's finding that the Home Office's Wethersfield policy change was made without any equality impact assessment, the Equalities Impact Assessment submitted here should be examined for substance, not merely presence — in particular for the safeguarding of vulnerable men in a 1,256-bed single-sex facility and for the impact on the protected characteristics of the existing local population.
- Permission under s293C is excluded from statutory biodiversity net gain (Schedule 7A, para 17(a)(ii)). The preliminary ecological appraisal and HRA screening therefore carry the whole ecological burden and should be independently reviewed.

4. Risk summary (RAG)

The table below indexes each risk to the remedy sought, so that the conditions in Section 7 can be read against the ground that makes each of them necessary. Red denotes a risk that cannot be mitigated to an acceptable level by condition without fundamentally changing the scheme; Amber a risk that could be mitigated by robust, enforceable conditions and funding.

Risk area	Rating	What would change the rating
Foul drainage / WwTW	**RED**	Published EA and Thames Water positions; permit granted pre-occupation; occupancy cap tied to permitted capacity; decommissioning condition.
Potable water & fire water	**AMBER**	Thames Water capacity confirmation; fire authority sign-off; Home Office-funded reinforcement.
Legacy private MoD networks	**AMBER**	Published condition surveys and demarcation statement; renewal or adoption completed and certified pre-occupation; named operator for any retained private network.
Electricity	**AMBER**	DNO connection offer accepted and delivered pre-occupation; no diesel generation as primary supply.

Risk area	Rating	What would change the rating
Asbestos, demolition & ground condition	AMBER	Published R&D surveys and geo-environmental report; HSE-notified removal completed and certified pre-occupation; approved remediation and arisings strategy.
Transport & highway safety	RED	Not curable at 1,256. Reduced cap plus funded dedicated transport and OCC-approved safe-route works.
Primary care & dental	RED	ICB-committed, Home Office-funded on-site GP, dental, pharmacy and mental health for full term, pre-occupation.
Policing & emergency services	AMBER	Binding ten-year funding agreement with PCC, OCC, CDC, ICB and Fire & Rescue, published before occupation.
Resident welfare	RED	Cap well below 1,256; 9-month maximum stay; independent monitoring with published data; on-site legal and health access.
Community cohesion & housing market	AMBER	Absolute ten-year cessation; community liaison and funded community fund; phased cap with review.
Value for money / public benefit	AMBER	Published cost-per-person comparison before determination.
Planning history	RED	Applicant to address the 2003 Inspector's findings point by point; equivalent obligation and service model as a minimum.
Process & evidence	RED	Extended period with letter notification of all affected households; disclosure; EIA reconsidered; EqIA independently reviewed.

5. Anticipated responses from the applicant, and why they do not answer the objection

"The site will be largely self-sufficient, minimising impact on the community."

'Largely' is undefined and unenforceable. Wethersfield was described in identical terms and generated 141 missing-person referrals in a quarter, sustained off-site pedestrian movement and a neighbouring council spending £150,000 on security. Self-sufficiency is a design outcome that must be specified — on-site primary care, dental, pharmacy, mental health, legal access, faith, education and retail — and secured by condition, not asserted in a factsheet.

"Health provision will be agreed with the ICB; policing with TVP; utilities with Thames Water and the DNO."

Then the application is premature. A decision-maker cannot conclude that a development is acceptable on the basis that the things which would make it acceptable will be negotiated later with parties who have not yet agreed. The proper course is to publish those parties' written positions before determination, or to impose pre-occupation conditions that make occupation impossible until they are delivered.

"The 3,510 figure is an outdated estimate; 1,256 is what is applied for."

Accepted for present purposes. But the applicant submitted the document as part of its application, has not corrected or withdrawn it, and has a record of increasing capacity at its other large site once permission was in hand. If 1,256 is genuinely the ceiling, the applicant will not object to a condition that makes it one.

"Occupation will be phased, starting small."

Phasing without infrastructure triggers is a timetable, not a mitigation. Each phase should be gated to a demonstrated capacity milestone — permitted treatment capacity, ICB-confirmed clinical capacity, delivered transport — with the Secretary of State or the LPA as the discharging authority.

"The permission is temporary."

Ten years is longer than most residents' tenure in their homes, and the treatment works, water and power infrastructure are permanent. Wethersfield's 'temporary' capacity has been extended and expanded. If the applicant means temporary, it should accept an absolute cessation and restoration condition without a mechanism for extension by variation.

"Permission was granted for an accommodation centre on this land in 2003, so the principle is established."

The 2003 permission was for a 750-place statutory accommodation centre with comprehensive on-site services secured by a s299A obligation binding both councils and two Secretaries of State; it was granted against the Inspector's recommendation, has long since lapsed, and the project was cancelled with £28m written off. It does not establish the acceptability of a 1,256-place 'basic' facility with no obligation. If anything, the Inspector's unchallenged findings on isolation and pedestrian safety are the part of that history that survives.

"Property values are not a planning matter."

Agreed, and this representation does not ask that they be treated as one. The material considerations are amenity, safety, cohesion and the ten-year duration; the market effect is the evidence that those impacts are real and borne by identifiable households.

"This is necessary to end the use of hotels, which is a national priority."

The national priority is not in dispute. The question is whether this site can deliver it lawfully, safely and at acceptable cost. The NAO evidence is that large sites have cost more than hotels and delivered a fraction of the planned capacity; the Wethersfield evidence is that the model has harmed the people it accommodates. Dispersal accommodation, smaller sites with existing infrastructure, and sites within settlements that already have services are the alternatives the applicant should be required to show it has considered and rejected on evidence.

6. Alternatives the Secretary of State should require the applicant to address

A representation that objects should say what would be better. The following are the alternatives against which this application should be tested, in descending order of preference:

1. **Dispersal and smaller sites within existing settlements** with spare service capacity — the model the NAO and ICIBI evidence favours on both cost and welfare. The applicant should publish the site-selection evidence showing why this was rejected for Oxfordshire.
2. **A materially smaller facility at Site A** (indicatively no more than a few hundred places), sized to the infrastructure that can be demonstrated rather than to the applicant's national programme target, with a maximum length of stay and a fixed, shorter term.
3. **Deferral to the standard Crown development route** with an Inspector, a proper representation period and full disclosure. The 'delay to 2027' the applicant cites is a matter of months against a ten-year permission.
4. **If the scheme proceeds at all, the conditions in Section 7** — which convert the applicant's aspirations into enforceable obligations and put the cost of serving the site where it belongs.

7. Conditions and obligations sought in the alternative

If the Secretary of State is minded to grant permission notwithstanding the above, the following conditions and obligations are the minimum necessary. They are drafted so that each phase of occupation is gated to delivered, not promised, infrastructure and so that costs are borne by the applicant.

A. Occupation caps gated to infrastructure

C1. No occupation until (i) an Environmental Permit for the wastewater treatment works has been granted and the works commissioned and independently certified; (ii) Thames Water has confirmed in writing that potable and fire-water supply is adequate for the permitted phase; (iii) the DNO connection is energised; and (iv) Oxfordshire Fire and Rescue has confirmed fire-water and access adequacy.

C2. Before any works, a condition survey of all existing private water, foul, surface-water, fire-main and electrical networks on the site, with a scheme of renewal, replacement or adoption approved in writing; no occupation until the approved scheme is complete, tested and certified, and a named operator with statutory competence is appointed for any network the statutory undertakers do not adopt.

C3. Before any demolition or refurbishment, refurbishment and demolition asbestos surveys of all affected buildings and an asbestos removal and demolition-arisings management strategy approved in writing; no occupation of any building until a clearance certificate for that building has been issued and a remediation verification report for the site, addressing the findings of the geo-environmental and UXO assessments, has been approved.

C4. Occupancy in each phase not to exceed the capacity certified under (i)–(iv) for that phase, with a first-phase cap and a scheme of phase releases approved in writing by the Secretary of State on the advice of Cherwell District Council as LPA.

C5. An absolute maximum occupancy, to be set by the Secretary of State on the evidence, substantially below 1,256; no increase by non-material amendment or s73 variation. This condition is necessary in the light of the 3,510-person figure in the applicant's own UXO assessment and the applicant's record of raising permitted capacity at Wethersfield from 800 to 1,245.

B. Health

C6. Before first occupation, a Health Provision Scheme agreed with the BOB ICB and funded in full by the Home Office for the full term, providing on-site GP, nursing, dental, pharmacy, mental health and safeguarding services scaled to the permitted occupancy, with no registration of residents at existing local NHS practices except in emergency.

C. Transport and highway safety

C7. A funded dedicated transport service to Bicester (and other agreed destinations) at frequencies approved by Oxfordshire County Council, operating for the full term; safe-route works (footway, lighting, crossings) approved and completed pre-occupation; a Construction Traffic Management Plan for demolition and modular delivery.

D. Policing, emergency services and local authority costs

C8. A binding ten-year funding agreement between the Home Office and the Thames Valley PCC, Oxfordshire County Council, Cherwell District Council, the BOB ICB and Oxfordshire Fire and Rescue, index-linked and reviewed annually, covering all additional costs attributable to the facility, published before first occupation, so that no cost falls on council-tax or precept payers.

E. Welfare, safeguarding and monitoring

C9. A maximum length of stay for any resident (Wethersfield's current limit is nine months); an independent monitoring body reporting quarterly to the LPA, the ICB and the PCC with published safeguarding, health, missing-person and incident data; on-site legal advice access; a Community Liaison Group with resident, parish, district, county, police, NHS and Home Office membership meeting monthly.

F. Term, cessation and restoration

C10. Use to cease absolutely ten years from first occupation with no mechanism for extension; all modular accommodation removed and the site restored in accordance with an approved scheme within twelve months of cessation; a decommissioning plan for the wastewater treatment works agreed with the Environment Agency; the obligations secured by a planning obligation or unilateral undertaking enforceable by Cherwell District Council.

G. Review

C11. An independent review of the operation of the facility against these conditions at twelve months from first occupation, published, with the Secretary of State to consider whether the permitted occupancy should be reduced in the light of its findings.

8. Conclusion

This application asks the Secretary of State to permit, in eleven days and on a partly withheld evidence base, a ten-year settlement of 1,256 adult men on a site with no accommodation history, between two villages that together number fewer than the proposed population, served by roads its own Transport Assessment calls unsuitable, health services that are demonstrably at capacity, and utilities so constrained that the applicant proposes to build its own sewage works. The direct precedent for the model has been found unlawful by the High Court, criticised by the Independent Chief Inspector, and shown by the NAO to cost more than the hotels it was meant to replace. The direct precedent for the site — the Home Office's own 2002–2005 scheme — produced an Inspector's recommendation to refuse at 750 places and a £28m write-off.

Governance requires that a decision of this scale be evidence-led, that infrastructure be delivered before it is relied upon, and that the costs of a national programme are borne by the national applicant and not transferred to Oxfordshire's council-tax payers. Measured against those principles the application is premature and should be refused. If it is not refused, the conditions at Section 7 are the minimum that would make it acceptable.

I would be glad to expand on any of the infrastructure points above, and I ask to be notified of the decision.

Nikki Evans
[redacted]