From: Charlotte Culley
To: Crown Casework
Subject: FORMAL OBJECTION TO APPLICATION 26/01833/CROWN / PCU/RARE/C3105/3378843
Date: 11 September 2026 08:57:14

[redacted]

To Whom it may concern

I wish to submit a formal objection to the above application for the temporary use of MOD Bicester Site A to accommodate up to 1,256 single adult male asylum seekers, together with associated accommodation, roads, parking, security infrastructure, recreational areas, wastewater infrastructure and other facilities.

I fully recognise the Government's responsibility to provide appropriate accommodation for people seeking asylum. My objection is not based upon the nationality, ethnicity or immigration status of the proposed occupants. My objection concerns the suitability of this particular site, the significant unresolved environmental and infrastructure constraints, the potential effects on neighbouring communities and protected species, and the fact that a number of the Government's own technical documents identify matters requiring further investigation.

I respectfully ask that you consider the following material planning matters before determining the application.

1. Serious existing surface-water flooding and drainage problems
Flooding and drainage are my principal concerns. The Government's Flood Risk Assessment identifies the site as approximately 50.1 hectares and confirms that parts of it are within Flood Zones 2 and 3. It also identifies areas of the site at high, medium and low risk of surface-water flooding. More importantly, this is not simply a matter of theoretical flood mapping.

The Government's Drainage Design Statement records that during a site inspection on 25 February 2026, despite dry weather and no recorded precipitation, there was localised surface-water flooding and ponding, elevated water levels in ditches and watercourses, blocked drainage features and evidence of inadequate maintenance. The report also identifies areas of the site which are prone to frequent surface-water flooding and records that two pumps previously used for flow management were not operational. These are significant existing problems which need to be resolved before adding a development accommodating up to 1,256 people.

The Government's own Flood Risk Assessment recommends further work including hydraulic modelling, CCTV investigation of the drainage network, groundwater investigation and confirmation of drainage connectivity and capacity. I therefore ask that approval is not granted on the assumption that these matters can simply be resolved later by condition.

There should first be:

* a complete hydraulic model of the site;
* CCTV investigation of existing drainage infrastructure;
* confirmation of all drainage routes, outfalls and connections;
* confirmation of groundwater levels;
* assessment of the capacity and condition of existing drainage;

* assessment of the effects of climate change and extreme rainfall;
* independent verification of the proposed SuDS system; and
* proof that the development will not increase flood risk to neighbouring land, roads, properties or downstream areas.

The Government's own supporting documents should be treated as evidence that further investigation is necessary, rather than evidence that the problem has already been resolved.

2. Clay and poorly draining ground conditions
The site's ground conditions make the drainage issue particularly important. The Flood Risk Assessment identifies slowly permeable, seasonally wet loamy and clayey soils, with parts of the site having impeded drainage. The development will introduce substantial areas of accommodation, roads, hardstanding, parking and other infrastructure onto the site. I am therefore concerned that surface water which currently infiltrates or follows existing natural routes could instead be concentrated and accelerated into drainage channels and neighbouring areas.

The suitability and long-term performance of infiltration and attenuation measures must be demonstrated through proper site-specific ground investigations and hydraulic modelling. It would be inappropriate to rely upon assumptions about infiltration or drainage performance when the site's existing condition already includes ponding and localised flooding.

3. Wastewater and sewage infrastructure is not adequately established
The proposed development would introduce a very substantial additional population onto a site which does not currently have the necessary permanent wastewater infrastructure established. The Government's Utilities and Infrastructure Assessment states that no on-site wastewater treatment works has been identified and that important information regarding wastewater and sewer capacity remains uncertain.

The nearest identified municipal wastewater treatment works is approximately 5.8 km away. The Government's Drainage Design Statement states that the existing treatment works serves a Population Equivalent of approximately 40,436, while the proposed development would add approximately 4% to this figure. Crucially, the assessment states that whether the existing sewer has sufficient capacity to accept the additional flows has yet to be confirmed.

The proposal therefore raises a fundamental question:

Where will the sewage go, and has the receiving infrastructure been demonstrated to have sufficient capacity?

I ask that definitive confirmation is obtained from the relevant water and wastewater authorities before any approval, including:

* available sewer capacity;
* wastewater treatment capacity;
* permitted discharge capacity;
* emergency arrangements;
* the permanent foul-water solution;
* arrangements in the event of infrastructure failure; and
* the environmental consequences of any temporary tanker-based solution.

These should not be matters left unresolved until after planning permission has been

granted.

4. Water and electricity infrastructure
The same concern applies to other essential utilities. The Government's Utilities and Infrastructure Assessment estimates the development's maximum electrical demand at approximately 2.16 MVA. The assessment nevertheless identifies uncertainty regarding the capacity of existing electrical infrastructure and proposes temporary and/or permanent generation arrangements. A development of this scale, operating continuously, should have a clearly demonstrated and reliable electricity supply before approval.

The use of generators also raises additional issues concerning:

* noise;
* air quality;
* fuel storage;
* emissions;
* visual impact;
* night-time disturbance; and
* ecological effects.

Similarly, the proposed water supply arrangements depend upon available capacity being confirmed. The question is therefore not whether utilities can theoretically be provided, but whether the necessary capacity has actually been demonstrated.

5. Protected species and ecological value
The ecological constraints of the site also require considerably more scrutiny. The Government's Preliminary Ecological Appraisal identifies habitat suitable for a number of protected and notable species, including:

* bats;
* breeding and nesting birds;
* great crested newts;
* reptiles;
* badgers;
* invertebrates; and
* other protected or notable species.

The report is particularly important because it expressly states that it cannot be considered a comprehensive assessment of the ecological interest of the site.

It recommends further targeted surveys, including surveys for:

* breeding birds;
* Barn Owl;
* great crested newts;
* reptiles;
* terrestrial invertebrates; and
* hazel dormouse.

It also identifies trees with potential for bat roosts, for which further survey work may be necessary. This means the Government's own ecological documentation establishes that the ecological position has not yet been fully determined. I therefore request that no clearance, demolition or construction affecting potentially sensitive habitat is permitted until the recommended surveys have been completed during the appropriate survey

seasons.

6. Potential effects on Arncott Bridge Meadows SSSI
The Government's EIA screening material records that Natural England identified potential significant effects on Arncott Bridge Meadows SSSI and that hydrological connectivity between the development site and the SSSI could not be ruled out. Natural England therefore advised that it needed to be demonstrated that the development would not alter the existing hydrological regime and consequently affect the SSSI.

This directly links the site's drainage and flooding problems to a potentially important designated ecological site.

The relationship between rainfall → site drainage → ditches/watercourses → downstream ecology must therefore be properly established before the development proceeds. I ask that the you require definitive evidence that the proposed development will not adversely alter the hydrology or water quality of the SSSI.

7. Noise pollution
The development would introduce a substantial new 24-hour population and operational activity into the area. The Noise Impact Assessment identifies existing night-time noise levels across the site in the region of **35–61 dB LAeq,8hr**.

The proposed development will introduce additional sources of noise, including:

* residents;
* staff movements;
* vehicles;
* deliveries;
* security infrastructure;
* recreational activity;
* plant;
* generators; and
* other 24-hour operational activity.

This is particularly relevant because noise affects not only residents but also wildlife, including bats and nocturnal species. I therefore request that noise is assessed on the basis of actual operational conditions, including night-time activity and generators, rather than simply whether average noise levels technically fall below a particular threshold. The cumulative effects on nearby residents and wildlife should be properly considered.

8. Light pollution
Light pollution is a further significant concern. The surrounding area has a relatively rural character and the B4011 in the immediate vicinity is not generally characterised by conventional urban street lighting. The proposed facility will require security lighting, access lighting, accommodation lighting, parking lighting, recreational-area lighting and emergency lighting. A development operating continuously could therefore create a substantial new source of artificial light.

This has potential consequences for:

* nearby residents;
* drivers;
* the rural character of the area;
* bats;

* insects;
* birds; and
* other nocturnal wildlife.

I therefore request that a dedicated lighting and light-spillage assessment is undertaken, including consideration of the ecological effects of artificial lighting.

9. Insufficient opportunity for meaningful local scrutiny
I am hugely concerned about the way in which the proposal has been brought forward. This is an unusually large and complex development involving drainage, flooding, ecology, highways, utilities, noise, lighting and wastewater. The application is being considered under the Government's Urgent Crown Development procedure rather than through the normal local planning determination process. The Government confirms that the application is for a temporary 10-year use and that the formal representation period runs only from 7 September to 17 September 2026. The scale and complexity of the technical documentation make this a very short period for members of the public to properly examine the evidence and formulate informed objections.

The Government's own application page confirms that representations will be considered insofar as they raise material planning considerations. I therefore ask that this representation is treated as a formal planning objection based upon the environmental, infrastructure and amenity matters set out above.

For the reasons above, I respectfully request that you refuse the application. Alternatively, if you are not minded to refuse the application at this stage, I request that a decision is deferred until the outstanding investigations have been completed and independently reviewed.

In particular, I request definitive evidence regarding:

1. Surface-water drainage capacity;
2. Hydraulic modelling;
3. Existing drainage condition and connectivity;
4. Groundwater levels;
5. Climate-change flood risk;
6. Wastewater and sewer capacity;
7. Water-supply capacity;
8. Electricity capacity;
9. Generator requirements and impacts;
10. Great crested newts;
11. Bats and potential bat roosts;
12. Breeding birds and Barn Owl;
13. Reptiles;
14. Invertebrates and other notable species;
15. Hydrological effects on Arncott Bridge Meadows SSSI;
16. Noise from residents, vehicles and generators;
17. Light pollution and ecological lighting impacts; and
18. The cumulative effect of all of these matters.

The Government's own technical evidence demonstrates that Site A has existing drainage and surface-water problems, constrained ground conditions, unresolved utility questions and significant ecological sensitivities. Where the Government's own assessments identify outstanding investigations, those investigations should be completed before, rather than

after, a decision is made.

I respectfully ask you to give these matters full and proper consideration and to refuse the application unless it can be demonstrated, with robust evidence, that the development can proceed without unacceptable flood risk, ecological harm, infrastructure failure, noise, light pollution or adverse effects on neighbouring communities.

Yours faithfully,

Charlotte Culley
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