From: Chris Doyle
To: Crown Casework
Cc: calum.miller.mp@parliament.uk; wpwsobjection@gmail.com
Subject: Objection to Application PCU/RARE/C3105/3378843
Date: 11 September 2026 16:16:25
Attachments: image.png

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Dear Secretary of State,

I write to formally object to planning application **REF: PCU/RARE/C3105/3378843**, which seeks the temporary change of use of the former Defence Storage and Distribution Centre at MOD Bicester A Site to provide non-detained asylum accommodation for up to 1,256 men.

My objection is based on the following planning concerns.

1. Drawing Information and Lack of Detail
The level of information submitted in support of this application is wholly insufficient given the scale and nature of the proposal. The development seeks to accommodate over 1,250 people, yet the supporting drawings contain significantly less information than would ordinarily be required for a much smaller residential development.

My specific concerns are as follows:

- **Site Location Plan (Drawing No. BIC-DR-AR-100105-P01)**
  No scale bar is provided. This is typically a validation requirement for planning applications and is necessary for accurate interpretation of the drawing.
- **Existing Site Plan (Drawing No. BIC-DR-AR-100106)**
  No scale bar is provided. This is typically a validation requirement for planning applications and is necessary for accurate interpretation of the drawing.
- **Site Demolition Plan (Drawing No. BIC-DR-AR-100108-P01)**
  No scale bar is provided. This is typically a validation requirement for planning applications and is necessary for accurate interpretation of the drawing.
- **Site Parameters Plan (Drawing No. BIC-DR-AR-100107-P01)**
  No scale bar is provided. Furthermore, this drawing contains very little meaningful information, merely indicating that development across the site may reach a height of up to 12 metres.

The absence of detailed plans prevents a proper assessment of the proposal's visual, environmental and operational impacts. Decision-makers and members of the public cannot reasonably evaluate the effects of the development when such fundamental information is omitted.

2. Ecology
The Preliminary Ecological Appraisal (PEA) identifies several significant limitations and clearly demonstrates that the ecological impacts of the proposal are not yet fully

understood. The report explicitly states:

"The survey was undertaken in late March, which is just outside the optimal survey window."

It further states:

"This report cannot, therefore, be considered a comprehensive assessment of the ecological interest of the site."

These statements alone demonstrate that the ecological baseline information remains incomplete.

In addition, parts of the site and numerous buildings could not be assessed:

"Preliminary roost assessments (PRAs) of buildings only completed on the exterior of buildings" because "the buildings were not safe to inspect internally."

As a result, the presence of protected species cannot presently be ruled out.
The PEA recommends a substantial number of further surveys, including:

- Hazel dormouse surveys.
- Breeding and nesting bird surveys, including targeted Barn Owl surveys.
- Great Crested Newt eDNA surveys.
- Reptile surveys.
- Terrestrial invertebrate surveys.
- Bat roost surveys for trees and buildings identified as having roost potential.
- Bat activity surveys.
- Pre-construction checks for badger and water vole.

Importantly, the report identifies that the site supports suitable habitat for several protected species and confirms the presence of common lizard. It also notes that one tree possesses potential maternity roost characteristics for bats.

The site is located approximately 1.82 km from Arncott Bridge Meadows SSSI and lies within its impact zone. The report acknowledges that consultation with Natural England may be required due to potential impact pathways, including hydrological connectivity and pollution risk.

The concluding statement of the PEA is particularly significant:

"Provided the measures within this report for further survey and mitigation can be adopted, it is anticipated that a design could be brought forward for this site that would be compliant with current local and national biodiversity planning policy."

This is clearly a conditional statement. Compliance with biodiversity policy has not yet been demonstrated and instead relies upon additional surveys and mitigation measures

that have not been completed.

Accordingly, it is my view that the application has not provided sufficient ecological evidence to enable an informed planning decision.

3. Environmental Impact Assessment Screening Direction
I have serious concerns regarding the Screening Direction and its conclusion that the proposal is unlikely to have significant environmental effects. The Direction concludes:

"For the reasons set out above, she has concluded that in the circumstances of this case, there are unlikely to be significant effects."

This conclusion appears inconsistent with the applicant's own ecological evidence, which confirms that:

- The ecological assessment is incomplete.
- Additional surveys are required.
- Protected species may be present.
- Mitigation measures have not yet been established.

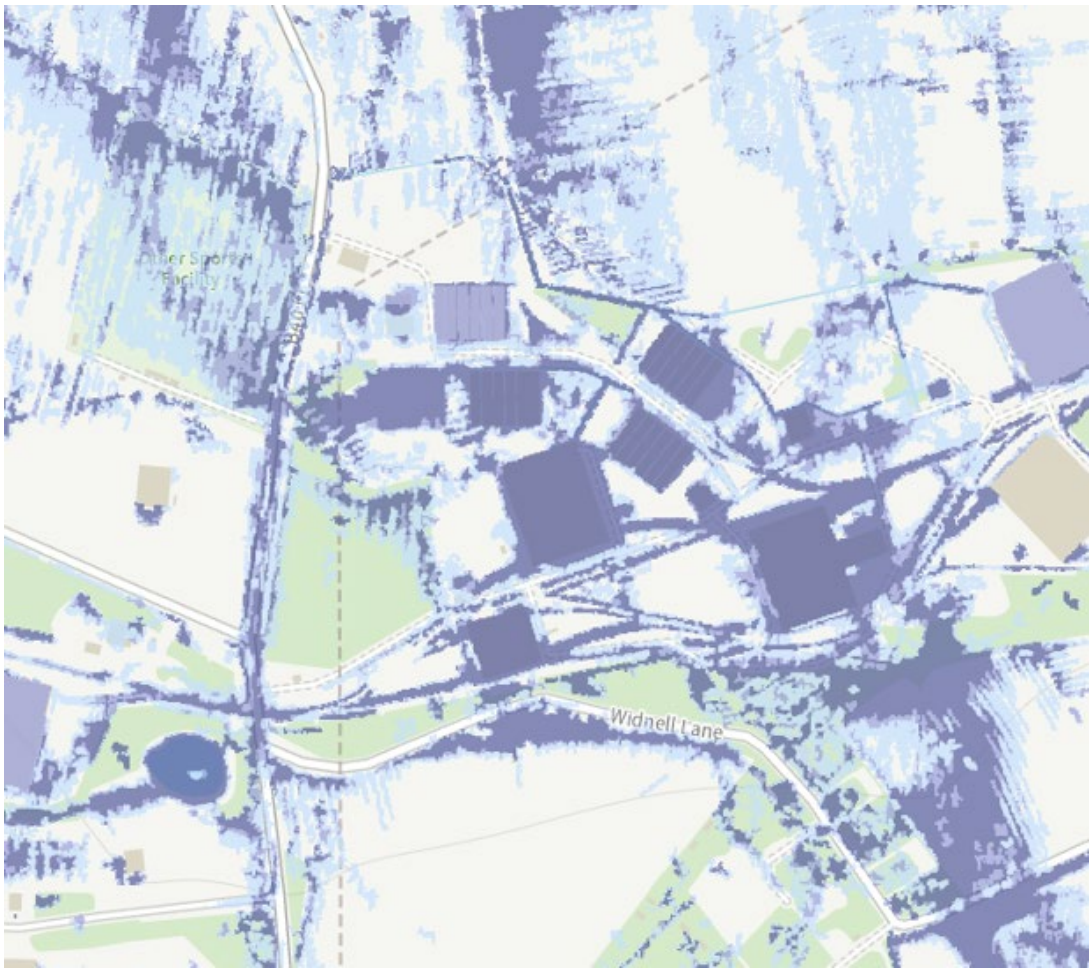
In my view, the available evidence does not provide a sufficiently robust basis to conclude that significant environmental effects can be ruled out.

Sewerage
The Screening Direction acknowledges that sewer capacity has yet to be confirmed. Instead, foul water is proposed to be tankered away during the initial phase of occupation until a longer-term solution is established.

This cannot reasonably be described as a complete drainage strategy. The proposal would introduce an additional residential population substantially greater than that of the nearby villages, yet the applicant has not demonstrated how wastewater infrastructure will accommodate this demand.

The absence of a confirmed foul drainage solution is a significant deficiency and should weigh heavily against the proposal.

Surface Water
Surface water flooding is already a known issue within the locality. A screenshot of the Surface Water Flood Risk is below.



While the applicant states that no new hardstanding is proposed, the limited information submitted makes it difficult to verify the extent of operational changes and their impact on runoff and drainage.

Given the site's environmental sensitivity and relationship to nearby ecological receptors, a comprehensive hydrological assessment should be undertaken before any determination is made.

4. Highways
The applicant's own assessment predicts a 12.1% increase in traffic during the morning peak period.

In my view, an increase of this magnitude should not be dismissed as insignificant, particularly given:

- The rural nature of the surrounding highway network.
- Existing agricultural vehicle movements.
- The limited capacity of local roads.
- The likely increase in wear and deterioration of highway infrastructure.

The cumulative impacts on highway safety and network performance require more detailed scrutiny.

5. Community Impact and Human Health
The conclusion of this section states that no significant effects are anticipated following mitigation.

However, the assessment itself identifies numerous community concerns requiring management measures, including security arrangements and protest management.
The nearest village, Piddington, has a population of approximately 300 to 400 residents. The proposed accommodation would introduce a population several times larger than the existing village population into the immediate area.

This represents a substantial demographic change that would inevitably alter the character of the locality and place additional pressure on local infrastructure and services.

In my view, the application does not adequately assess these long-term social impacts.

6. Travel Plan
The Travel Plan contains a number of assumptions that do not reflect the reality of the site's rural location.

While the document describes the development as largely self-contained, it is unrealistic to assume that residents will not regularly leave the site for recreation, social interaction, exercise and access to local destinations.

The site is poorly connected by sustainable modes of transport. There are limited pedestrian routes, limited cycling infrastructure and few opportunities to travel safely without the use of motorised transport.

There is a real risk that pedestrians will use roads such as the B4011 and Palmer Avenue despite the lack of suitable infrastructure. This creates potential highway safety concerns that have not been adequately addressed.

Furthermore, repeated references to the proposal being "temporary" should be treated with caution. Although permission is initially sought for ten years, the associated infrastructure is being designed for a longer lifespan and future extensions cannot be ruled out.

Consequently, the effects of the proposal should be assessed on the basis of its likely long-term impacts rather than on the assumption of a strictly limited ten-year occupation period.

Conclusion
For the reasons set out above, I consider that the application fails to provide sufficient information to enable a robust assessment of its ecological, environmental, infrastructure, transport and community impacts.

The applicant's own evidence identifies significant outstanding matters requiring further

investigation, including protected species surveys, drainage capacity assessments and environmental mitigation measures.

Until these matters have been properly addressed and evidenced, the proposal cannot be considered compliant with the requirements of the planning system or environmental legislation.

I therefore respectfully request that planning permission for application **PCU/RARE/C3105/3378843** be refused.

Many thanks.

Chris Doyle
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