Bicester Site A Planning Application Response. 13th Sept 2026

Planning Application Ref: 26/01833/CROWN

MHCLG Ref PCU/RARE/C3105/3378843

This response has been prepared following the review of a selected number of documents that have been made available for the public to view via the following website:

https://www.gov.uk/guidance/urgent-crown-development-application-mod-bicester-site-a

This document review and response is in respect of the planning application that has been by the Ministry of Housing Communities and Local Government (MHCLG) to Cherwell District Council for the development of a former defence storage & distribution centre site known as MOD Bicester A– site for a redesignated use, for the "temporary" housing of "asylum seekers".

This review has highlighted that there are a number subject areas in the planning application documents that are of concern where these include:

i) Factual inconsistencies and assumption "gaps" in the documents presented;
ii) Inadequate supporting data and analysis for some of the subjects "addressed";
iii) Heavy use of redaction for some of the content in the documents that have been made available

These areas of concern are discussed below, in respect of the documents reviewed:

1) Utilities and Infrastructure assessment
    a. There are multiple pages/text redacted preventing a review of the details hidden
    b. The proposal is based on using 2.16MVA of temporary mobile power generation units for the supply of electricity for the development. This is assumed to be diesel oil fuelled as there is no natural gas available. This is of great concern in a number of respects
        i. How are combustion emissions from the engines being addressed?
        ii. The CO_2 emissions created by this power supply arrangement are estimated to be approximately 5 times greater (on a gCO_2/kWH) basis that the average gCO2/kWh figure for "grid" supplied electricity (147.0gCO_2/kWH for 2025/26 see https://www.gov.uk/government/publications/fuel-mix-disclosure-data-table/fuel-mix-disclosure-data-table) This is somewhat counter to the government's legal commitment to achieving net zero greenhouse gas emissions by 2050 under the Climate Change Act 2008.
        iii. It is not apparent that the regular deliveries of diesel fuel oil required for this power generation facility have been included in the daily traffic movements. It is estimated that at full output, the power generation facility would require a supply of fuel of > 11,000 litres per day. Thus, depending on the fuel oil storage available on site is likely to require several deliveries per week by road.
        iv. The presence of this power generation facility does not appear to have been considered in the Noise Impact Assessment document.
        v. In consideration of the above points a more detailed assessment of the power supplies available from the local distribution network operator should

be conducted. This could enable a “grid based” power supply arrangement to be used at the proposed development.

c. The treatment of water effluent and in particular foul effluent appears to be in a complete muddle. In the Utilities and Infrastructure Assessment it is assumed that a new effluent treatment plant is to be built; though no details of this new facility are included in this assessment. In the Written Statement on the Environment, it is assumed that the foul effluent is removed by road tanker to a local effluent treatment works. A number of questions arise from this inconsistency
    i. Which method of effluent disposal is actually proposed?
    ii. What effluent treatment capacity is available locally?
    iii. What are the envisaged total effluent road tanker movements per day?
    iv. Are these tanker movements in included in the transport assessment?

2) Transport Assessment
    a. There are multiple pages/text redacted preventing a review of the details hidden
    b. It is unclear that the road movements for the delivery of fuel oil and removal of effluent and other wastes have been considered in this assessment. In addition, there is no mention of the daily traffic movement required by the supervisory shift staff nor for the supplies of food and other consumables required by the facility. The status of these assumptions should be assessed and confirmed for use in the planning application documentation.

3) Landscape and Visual
    a. There are multiple pages/text redacted preventing a review of the details hidden
    b. There is no detail provided whatsoever for the visual appearance of the proposed facility including the modular accommodation units, messing, welfare, entertainment and utility facilities that are require to operate the proposed development. For a planning application this is most unusual to have such a lack of detail available for review. This matter should be addressed.

4) Preliminary Ecological Assessment,
    a. There are multiple pages/text redacted preventing a review of the details hidden
    b. It is unclear whether / how the impact of the planned utilities infrastructure namley power generation, foul drainage treatment and solid waste management is to be managed in respect of the impact on the local ecology.
    c. More detail on this should be supplied regarding the impact of the proposed development on the local ecology

5) Air Quality Screening Technical Note
    a. There are multiple pages/text redacted preventing a review of the details hidden
    b. It is unclear whether / how the impact of the planned utilities infrastructure namley power generation, foul drainage treatment and solid waste management is to be managed in respect of the impact on the local air quality.
    c. More detail on this should be supplied regarding the impact of the proposed development on the local air quality

6) Noise Impact Assessment
    a. There are multiple pages/text redacted preventing a review of the details hidden
    b. It is unclear whether / how the impact of the planned utilities infrastructure namley power generation, foul drainage treatment and solid waste management is to be managed in respect of the impact on noise emissions.
    c. More detail on this should be supplied regarding the impact of the proposed development on noise emissions in local area.

7) Written Statement on the Environment
    a. There are multiple pages/text redacted preventing a review of the details hidden
    b. The statement contains conflicting text when compared with other documents the planning application as identified below:
        i. This written statement indicates that existing hard standing will be used for the modular accommodation units. There is no mention of power generation equipment. The Geotechnical assessment indicates that there is settlement of the existing hard standings and thus removal remediation and or piling may be required prior to use as foundations for the proposed modular units. Further detail on what is actually planned should be provided
        ii. This document indicates that the foul water is to be tinkered of site to a local effluent treatment works (the spare capacity of which is yet to be assessed). Other documents in the Planning Application indicate that an "on site" treatment option is planned. Which is it? Further detail on what is actually planned should be provided
    c. Items requiring more detail and information:
        i. This document indicates that the 1256 Service Users (SUs) will be in the facility for up to 90 days – what happens if it is longer? More clarity is required
        ii. The document indicates that the GP services for the 1256 SUs can be provided by Langford medical practice Bicester and/or Brill Surgery. Given that the latter is part of the Unity Health group, not all GP appointments that are provided for patients are available at this Brill location; thus requiring the patient to travel to Thame, Chinnor or Princes Risborough. In the context of the 1256 SUs requiring access to GP services, the use of the Unity Health practice would potentially be onerous and costly. Further investigation and planning on how GP services in the area are to be actually provided to the SUs should be conducted; particularly in the context of the written text in this statement namely *"and is ranked in the second most deprived percentile in this regard and the measure to alleviate extra burden on local facilities is set out above under the 'Health of Service Users' subsection"*
        iii. Safety and Security in the context of SUs leaving and returning to the site *"To enter or exit the site on foot would require considerable care and SUs will be strongly encouraged to only do so using the shuttle bus provision on safety grounds. To further emphasise the potential danger, high visibility vests will be provided to those leaving on foot and further discourage this mode."* How likely is the practice of wearing high visibility vests and signing in and out of the facility (Ref MOD Bicester (Site A) Oxfordshire: Factsheet) actually going to be achieved in practice. More detail is required in this matter

8) Preliminary Risk Assessment for Unexploded Ordnance
    a. There are multiple pages/text redacted preventing a review of the details hidden
    b. There is a conflict in the number of stated SUs planned for the facility is it 3510 or 1256. More clarity is required on the actual number of SUs expected to be at the facility at any given time.

9) MOD Bicester (Site A) Oxfordshire: Factsheet
    a. There are a number of unanswered questions together with some clarifications that this factsheet prompts; where these include the following items as listed below. These matters should be addressed either as part of the Planning Application process or in another related forum. Reference to the fact sheet item number is made where appropriate.
        i. Item 7 It is unclear how public safety is to be maintained if the SUs are at liberty to "come and go" from the site at will. How can it be assured that they return if they have left the site? Given that if the SUs are not "detained" at the site (where detaining them would likely require a change of legislation and or regulations) the use of a personal tagging system could provide a suitable alternative to "keep track" of the SUs while their claim is being processed. This could help to address the public safety concerns.
        ii. What are the SUs going to do at the site while they are there? Keeping 1256 men occupied and not "causing trouble" to the local community will be challenging. More detail is required on this.
        iii. What assessment of other sites has been made as part of this planning application process? More detail is required
        iv. How does the total cost of providing this facility for SUs compare with the current provision / arrangements; given that this is tax payer funded? How is best value for the tax payer going to be achieved? More detail on this is required
        v. The Factsheet presents a series of "frequently asked questions and answers" (FAQs) regarding the proposed facility. Framing these FAQs as "Fact" is incorrect as the answers provided are in the main are more an expression of intent rather than fact per se. Thus, the intent of the document should be re-cast as a series of "FAQs" rather than Facts, so as not to mis-lead the reader.

Prepared by:

John Chappell CEng FI Mech E

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