From: Mario Terzino
To: Crown Casework; planning@cherwell-dc.gov.uk
Cc: [redacted]
Subject: Re: Objection to Urgent Crown Development Application - MOD Bicester (Site A); Application reference: PCU/RARE/C3105/3378843
Date: 13 September 2026 22:43:18

[redacted]

Mario Terzino
[redacted]

7th September 2026

Crown Casework Unit Ministry of Housing, Communities and Local Government

Re: Objection to Urgent Crown Development Application MOD Bicester (Site A)
Application reference: PCU/RARE/C3105/3378843
Site: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE
Applicant: Home Office

Dear Sir/Madam,

I am writing [redacted] to formally object to the above application for a 10-year temporary change of use of MOD Bicester Site A to provide non-detained asylum accommodation for up to 1,256 service users. My objections are based on the applicant's own supporting documents and are set out below in order of importance.

1. The applicant's own drainage report puts the sewage works as close as 45 metres from residential accommodation well inside its own stated safety margin The Drainage Design Statement (Section 9.6, "Odour and Noise") states in terms that "a standard odour boundary from a WwTW [wastewater treatment works] is ~250m from the source of odour," and recommends odour modelling be carried out at 10m, 25m, 50m, 100m and 250m. The same document then confirms that the current masterplan allows only around 100m separation between residents and the WwTW in Phase 1, and that "the residential and welfare units are intended to be approximately 45m from the WwTW for future phases." It further confirms that Launton FC's Bicester Garrison Sports Ground, used by the local community, sits only around 130m from the intended WwTW location. On the applicant's own figures, the accommodation itself will sit at less than a fifth of the odour buffer distance that the same report says is standard for a facility of this kind, and the neighbouring community sports ground falls well inside it too.

2. Power, water and sewage infrastructure does not exist on site, and the applicant's own report says the design is not yet resolved
The Utilities and Infrastructure Assessment ("Operation Nettlefire," ref. ONF-15-RP-CV-100003) confirms: no on-site wastewater treatment works has been identified, and the "foul water strategy at RIBA Stage 2 is constrained by incomplete site information," with "key data gaps" including capacity at the municipal treatment works and the condition of the existing foul network (Section 4.6); the existing electrical infrastructure "cannot be relied upon," so temporary and/or permanent generators are proposed to meet an estimated demand of approximately 2.16 MVA (Section 4.2); and potable water is to be "supplemented via a storage tank system" because the mains supply cannot be assumed adequate (Section 4.1). The report's own summary and conclusion states plainly that the surface water strategy "is based on assumptions due to limited surveys, no stakeholder engagement, and incomplete site information, including the absence of ground investigation, CCTV surveys, and full topographical coverage" (Section 5). This is the Home Office's own assessment that the basic services for over a thousand residents power, drinking water and sewage disposal remain unresolved and are, by the applicant's own words, guesswork pending further surveys.

3. A decade of diesel generation is proposed, but its air quality impact has not been assessed at all.
The Utilities and Infrastructure Assessment confirms the existing electrical infrastructure "cannot be relied upon" and that temporary and/or permanent generators will be needed to meet an estimated maximum demand of approximately 2.16 MVA (Section 4.2), enough to indicate large-scale, sustained diesel generation is intended to substitute for a mains supply, potentially for the full 10-year life of the permission. Despite this, the Air Quality Screening Technical Note assesses only construction dust and vehicle emissions; it states in terms that vehicle-emission dispersion modelling "is not required" and confirms that "the baseline and operation phase dispersion modelling has not been undertaken." Nowhere in the application is there any assessment of the NOx, particulate or CO2 emissions of the generators themselves, even though these are the source proposed to keep the site running. Separately, the Habitats Regulation Assessment/PEA mitigation section describes any on-site fuel as "minimal in volume" a characterisation that is difficult to reconcile with a site drawing 2.16 MVA from generators rather than the grid. The Fire Strategy Report, which would ordinarily be expected to address the storage and handling of bulk fuel for an installation of this kind, does not mention fuel storage at all. The applicant should be required to state the actual generator capacity, fuel storage and consumption figures, and to carry out a proper air quality assessment of operational-phase generator emissions, before this application can be considered adequately assessed on environmental grounds.

4. The site's own ecology survey admits it is not a comprehensive assessment
The Preliminary Ecological Appraisal states that the site visit was carried out in late March, outside the optimal survey window of April–September, and concludes in its own limitations section: "this report cannot, therefore, be considered a comprehensive assessment of the ecological interest of the site." Targeted surveys are still recommended, not yet completed, for hazel dormouse, Barn Owl,

breeding birds, great crested newt, reptiles and terrestrial invertebrates, and pre-construction checks are still outstanding for badger and water vole (Section 5.0, Conclusions). Several trees on site were found to have features suitable for roosting bats. The same section confirms the site lies only 1.8km from Arncott Bridge Meadows SSSI and falls within its impact zone. A decision of this scale should not be made on an ecological baseline the applicant's own ecologists say is incomplete.

5. Natural England itself flagged potential significant effects on the neighbouring SSSI, and the basis for later reassurance is not yet finalised

The Home Office's own Written Statement on the EIA screening direction records that Natural England advised on 23 July 2026 that "the proposal could have potential significant effects on Arncott Bridge SSSI," and that the hydrological connection between the site and the SSSI "cannot be ruled out." Natural England's later comfort, given on 11 and 13 August 2026, is expressly conditional on water quantity and quality being properly managed through the final drainage design, but the applicant's own documents confirm that the foul water and surface water drainage strategies are still provisional and "have yet to be confirmed." The conclusion that no full Environmental Impact Assessment is required therefore rests on a design that does not yet exist, for a site next to a statutory-designated wildlife site that a government advisor has already flagged as being potentially significantly affected.

6. The Transport Assessment's traffic and access conclusions appear to rely on data for the wrong road

The Transport Assessment repeatedly identifies the site access road as "the B1104" including the 7-day Automatic Traffic Counter results for both the northern and southern site accesses (Sections 3.9.2–3.9.6) and the local amenities description (Section 3.6.1) and Table 5-5 is titled "Traffic Impact B1104." However, the same document elsewhere correctly and repeatedly identifies the actual local road serving the site as the B4011 (Sections 3.3.4, 3.4.2, 3.8.5), and the Utilities and Infrastructure Assessment likewise confirms a gas main runs "within the B4011" at the site boundary. There is no B1104 in this part of Oxfordshire. The B1104 reference appears in the same document that uses RAF Wethersfield in Braintree, Essex a site the applicant's own report calls "very similar in nature and scale" and whose traffic data has been used as "an appropriate proxy" for Bicester (Section 3.10, Section 5.3.13) raising the concern that traffic or access data intended for a different site has found its way into the assessment on which the access strategy for this site depends. The applicant should be required to confirm which figures in the Transport Assessment actually relate to the Bicester site before any weight is placed on them.

7. Key evidence, including on resident safety, has been withheld from public scrutiny

The Secretary of State has directed that a number of documents submitted in support of this application are "sensitive" under section 293B(11) of the Town and Country Planning Act 1990 and has withheld them from publication. On release, 11 sections of the application were reported to have been redacted, including the mitigating measures proposed for suicide and self-harm prevention, health and safety, and the handling of deaths on site. Residents and the local planning authority are therefore being asked to accept, without being able to see the

evidence, assurances about matters that go to the heart of site suitability. A process that determines the future of a rural community for a decade, and that touches on the welfare of the people who would live there, cannot be considered to have had proper public consultation when this much of the underlying justification is not open to inspection.

8. This exact proposal was rejected at the same site in 2003, for reasons that remain unaddressed
In 2003, the then government's own proposal to use this site for asylum accommodation was tested at public inquiry and rejected. The planning inspector's stated reasons were that the site was too isolated, that it posed risks to social cohesion, and that it would strain local services. Nothing in the current application explains what has changed since 2003 to overcome those findings; if anything, the isolation of the surrounding villages is unchanged and the proposed capacity (1,256) is higher than what was previously rejected.

9. Statutory consultation has not been properly carried out
Bicester Town Council wrote to the Home Secretary on 14 July 2026, and again on 27 July 2026, raising concerns about planning and site suitability, infrastructure capacity, access and transport, community safety, environmental impact, and the absence of consultation with neighbouring communities. Both letters requested a substantive response by 1 August 2026. That deadline passed, and as of the date this application was validated (2 September 2026), neither the Home Office nor the Home Secretary had acknowledged or responded to either letter. Piddington and the other villages immediately adjoining the site as distinct from Bicester itself have received no direct consultation at all.

10. The scale and duration are disproportionate to the setting
The application seeks a 10-year "temporary" permission to accommodate up to 1,256 single adult men on a site adjoining villages that have none of the infrastructure to support a population of that size. Piddington, immediately adjacent to the site, is served by only four roads and has no school, shop, pub, or public transport of its own. Its only shared amenities the village hall and playing field sit close to the site boundary and stand to become unusable in practice once the site is operating at this scale.

11. The site sits unusually close to a large number of schools
The government's own 2026 policy states that asylum accommodation should not be sited close to schools and nurseries, though it does not set a fixed distance. On official Get Information About Schools data, the nearest school to this site Langford Village Community Primary School is approximately 0.13 miles away in a straight line, with four schools within one mile and sixteen within two miles.

12. Pedestrian safety and local service capacity have not been demonstrated
The Transport Assessment itself confirms (Section 3.4.1) that "no footways are provided at the northern site access" and that all local roads are rural with grass verges rather than pavements. The Town Council's concerns about strain on local health services and policing have not been publicly answered, and no public information has been provided showing that NHS primary care, policing, or the local road network can absorb a resident population and associated staff of this scale for a decade.

Conclusion

For the reasons set out above, there are significant and unresolved concerns surrounding this proposal. These include the sewage treatment works being located at a distance that falls substantially short of the applicant's own recommended separation distance from residential accommodation; the admitted lack of resolved power, water and sewage infrastructure; and an ecological baseline which the applicant's own consultants acknowledge is incomplete.

There are also serious concerns regarding the potential impact on a neighbouring Site of Special Scientific Interest (SSSI), following warnings from Natural England that potentially significant effects have not yet been fully resolved. In addition, apparent errors within the Transport Assessment raise questions about the reliability of the underlying traffic data and, consequently, the conclusions drawn from it.

More fundamentally, this is an unsuitable location for a development of this scale. Its remote setting presents challenges for those who would be accommodated there, while the scale and nature of the proposal would place a disproportionate burden on the surrounding villages and their existing infrastructure and services. The substantial additional works and infrastructure required also raise legitimate concerns about whether this represents an appropriate and responsible use of public funds.

In light of these significant unresolved issues, I respectfully request that the application be refused.

At the very least, the representation period should be extended, all previously withheld or unavailable documents should be released, and the discrepancies and omissions identified above should be fully addressed. Any corrected assessments and supporting documents should then be re-published and made available for proper public consultation before the application is determined.

Yours faithfully,

Mr Mario Terzino

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