Application Reference: PCU/RARE/C3105/3378843
Date: 13 September 2026

Dear Sir/Madam,

RE: Site A, MOD Bicester – Formal Objection

I am writing to object to the proposed development at Site A, MOD Bicester for the accommodation of up to 1,256 single adult men.

I am a father of three children, a Chartered Civil Engineer, [redacted].

I have a number of serious concerns about the proposed development, which I have noted in the following pages:

1. Professional concern: inadequate technical assessment

As a civil engineer, I am professionally qualified to assess infrastructure proposals, and I am deeply concerned by the number of fundamental technical gaps, missing information and inconsistencies in the application.

The Site Parameters Plan, one of only three drawings put forward for approval, contains no dimensions, heights, access points, parking numbers or key. No site layout plan, floor plans, elevations, external lighting layout, boundary or security fencing plan, or drainage layout has been provided. At least nine matters are left to be resolved after any permission is granted rather than assessed now, including the lighting scheme, the contamination investigation, the long-term power supply, and the long-term foul and surface water drainage solutions. All of these are fundamental requirements to be able to determine the viability of the site, and from an informal review of utility information in the area I understand that most are near capacity, with certainly insufficient resilience for the number of additional people noted in the proposal. Indeed, even as a resident, I can confirm that the water pressure in the village is poor, with a regular subject of discussion in the village being the lack of water pressure.

This is not how major infrastructure development should be assessed. Key technical matters cannot simply be deferred to post-consent conditions and still provide decision-makers with the evidence base they need to make an informed judgment.

Drainage, flood risk and utilities capacity – fundamental uncertainties

The applicant's own utilities assessment states that the condition, capacity and configuration of the electrical network serving the site are "currently unknown", and that the capacity of the primary intake "has not been verified. Because of this uncertainty, the applicant proposes to rely on temporary and permanent generators to meet an

estimated maximum demand of around 2.16 MVA, rather than a confirmed grid connection.

That is not a sustainable solution for a site with a stated minimum operational life of ten years. Relying on generators for heating, hot water and cooking for over a thousand people, with no confirmed grid capacity, is technically inadequate and environmentally unacceptable.

Similarly, the nearest wastewater treatment works serves a population equivalent of around 40,436 and has been upgraded to a design capacity of around 67,840. The applicant's own utilities assessment states that "potential headroom may exist but requires confirmation of capacity and permit compliance". There is no evidence that Thames Water has confirmed, in writing, that the network can accommodate this scale of additional demand. This is particularly relevant with the known local flooding of the river Ray that occurs for several months of the year in the area.

The applicant's own Flood Risk Assessment records that around a quarter of the site has a "high chance" of surface water flooding in any given year, with further areas at medium and low risk. The Environment Agency's standard surface water modelling does not take account of the site's own private drainage ditches and pipework, whose condition has not been surveyed. The drainage strategy needed to manage this risk is being prepared separately and had not been finalised at the time the Flood Risk Assessment was submitted.

As an engineer, I cannot understand how a decision can be made on a development of this scale without confirmed drainage capacity, confirmed power capacity, and a finalised flood mitigation strategy already in place and assessed.

Ground conditions and contamination – premature assessment

The site's history as a wartime ordnance depot means there is a realistic risk of unexploded ordnance and contamination, but the assessment carried out is a preliminary, desk-based risk assessment only – no intrusive ground investigation appears to have been carried out before the application was submitted. The applicant's own geo-environmental assessment identifies areas of the site historically used for handling and storing munitions, and flags asbestos-containing material as a further contamination risk in the made ground.

Standard engineering practice for a site of this history and sensitivity would require intrusive investigation before submission, not deferred to a post-consent condition. Contamination, if present, has direct implications for foundation design, drainage, landscaping, health and safety during construction, and the long-term suitability of the site for residential use. These are not matters that can be left to be "sorted out later". This is also the case for the warehouses on site that are known to have asbestos-containing material in their construction. This is one of the most dangerous building

materials known in this country, in buildings that are known to be at the end of their design life and therefore liable to fail, put under additional stress and potentially putting the intended users and staff, as well as village residents as close as 150m away, as significant risk of life changing harm.

2. Pedestrian and wildlife safety – personal experience

[redacted] There is a large amount of wildlife in and around the proposed site. I understand some initial assessments have been done but the applicant's own ecological assessment states that it cannot be considered a comprehensive assessment, and records that a number of protected species surveys remain outstanding. No biodiversity net gain assessment appears to have been produced, despite this being a standard requirement for developments of this kind. In addition to this, the B4011 is heavily trafficked, and where a footway exists at all, it is roughly one metre wide. The Department for Transport's own inclusive design guidance, which the Transport Assessment says it has followed, recommends a minimum of two metres. Recorded traffic on the approach roads averages around 3,000 vehicles a day in each direction, with 85th percentile speeds of around 53–54 mph.

I have personally witnessed how unsafe this corridor is for pedestrians. Heavy vehicles pass within inches of the footway edge at speed. On several occasions I have had to step into the verge with my dog to avoid being struck. The idea that this route is suitable for an additional 1,256 people, many of whom will be walking or cycling to access shops, services and public transport, none of which are located nearby, is not credible.

The junction capacity modelling that concludes there is "plenty of spare capacity" carries the software's own warnings that heavy vehicle traffic was set to zero in three of the four modelled scenarios, despite this being a site expected to generate significant coach, minibus and delivery vehicle movements. As an engineer, I know that junction capacity models are only as good as the assumptions fed into them. If the assumptions do not reflect the reality of what the site will generate, the conclusions are worthless.

3. Inconsistencies and missing evidence

The application contains multiple internal inconsistencies that undermine confidence in its technical rigour:

- Some documents describe the site as vacant and non-operational; others describe it as leased and in active use for defence storage.
- Floorspace figures differ between documents (17,935 sqm in one, 17,350 sqm in another).

- The number of Nissen huts to be demolished is given as five in the Secretary of State's written statement, but the Drainage Design Statement records 24 Nissen and Romney sheds on site.
- The lowest site level is given as 62.29 metres above ordnance datum on the existing site plan, but as 64 metres in the heritage assessment.

These are not typographical errors. They suggest a lack of coordination and quality control across the application documents, which raises serious questions about the reliability of the technical assessments as a whole.

4. The rushed process

I am also concerned about the procedure being used. There is no statutory requirement for public consultation under this fast-track procedure, no guaranteed minimum period for representations, and no requirement to notify neighbouring residents directly. Our property sits 172m from, and overlooks, Site A (the proposed development) and will be directly impacted. The Home Office's own factsheet states a minimum operational life of ten years for the site, and its own Statement of National Importance says that, over time, the site is intended to be expanded for use as a long-term asylum accommodation solution. That does not sound like a case of genuine urgent necessity.

A smaller accommodation centre (capped at 750 people) was proposed nearby in the early 2000s. Following a fourteen-day public inquiry, an independent Inspector found the location unsustainable, citing isolation, risk to community cohesion, and strain on local services – and identified pedestrian road safety as one of only three reasons given for recommending refusal. That earlier scheme was abandoned within about two years as uneconomic. The current proposal is for a larger number of people, at greater scale, built on a similar argument about urgent national need, yet with even less scrutiny. I understand the commercial undertaking required to make the significant changes from an uninhabited storage area to accommodation for 1200 people, to deal with contaminants and to provide sufficient protection to them from a busy road, etc. If it was uneconomic in its previous form twenty years ago it will be much economically viable now.

What I am asking for

I ask that the Parish Council robustly oppose this application and ensure that my technical and personal concerns are fully represented in its submission to the decision-maker. Specifically, I ask that:

- No decision be made until confirmed capacity for power, water supply, foul drainage and sewage treatment has been demonstrated in writing by the relevant

network operators and service providers, including any spare capacity, inflation factors and other external impacts,

- No decision be made until a finalised, assessed flood risk and drainage strategy has been submitted, consulted on and approved,
- No decision be made until an intrusive ground investigation for contamination and unexploded ordnance has been completed, assessed and published.
- No decision be made until detailed drawings, including site layout, drainage layout, boundary treatment and lighting, have been submitted and assessed.
- The decision-maker be asked to clarify how technical matters of this magnitude can lawfully be deferred to post-consent conditions rather than assessed before permission is granted.

I am copying this response directly to the Parish Council to ensure it is also treated as a formal representation.

Please acknowledge receipt of this objection and keep me informed of all further developments.

Yours faithfully,



*Nicholas Cumming-Bruce, CEng MICE*

[redacted]