[redacted]

From: [redacted]
Sent: 13 September 2026 18:24
To: Crown Casework
Subject: 'Urgent Crown Development application for the 10-year temporary use of the former MOD Bicester as non-detained asylum accommodation' (PCU/RARE/C3105/3378843)

[redacted]

[redacted]

Dear Secretary of State,

We are writing to express our concerns regarding planning application 'Urgent Crown Development application for the 10-year temporary use of the former MOD Bicester as non-detained asylum accommodation' (Ref: PCU/RARE/C3105/3378843).

We are local residents and so often use the roads close to this site and, whilst they are not gridlocked commuter routes, they form the main route of access between Thame and Bicester and are busy and fast roads with patches of poor visibility and no footpaths. We are therefore concerned that the traffic plans and assessments associated with this application appear to be a 'tick-box' exercise rather than a representative assessment of the risks to road users, service users and staff.

The application clearly states that 'there is currently no pedestrian infrastructure provided along this section of the B4011, making both accesses inaccessible by foot' (Planning proposal statement, page 13). Both the SoS and Planning Inspector acknowledge that the roads surrounding the site are deficient in the provision of pathways (Planning proposal statement, page 21). Several other large scale planning applications in this area have been refused on the grounds of inadequate accessibility (e.g. see 16/02611/OUT).

The primary mitigation for pedestrian safety appears to be the expectation that service users will not leave the site on foot and will be provided with high visibility vests if they do so (EIA screening Direction: written statement, page 14). This expectation not only contravenes the National Planning Policy Framework to achieve 'healthy, inclusive, safe developments' (Planning proposal statement, page 40), that 'promote sustainable transport' (Planning proposal statement, page 40) but also the expectations of local planning which states that developments should 'make the fullest use of public transport, walking and cycling' (Planning proposal statement, page 45).

Even if the site is self-sufficient, it seems completely unrealistic that over a 9-10-week residency, service users will never leave the site on foot. If they do so, they will have to walk almost 1 mile down an unpaved and poorly lit rural highway with speed restrictions of 50mph to reach the local bus stop (for note the Travel assessment, page 22, erroneously measures the distance from the Southern gate, which will provide emergency access only (EIA screening Direction: written statement, page 3)). This will surely put them in danger and will increase the chances of accidents for all road users, especially in the winter months. But yet the travel plans do not include the service users at all. Indeed, in the travel plan, the site is classified as 'non-residential development' meaning that the service user needs are completely overlooked. If prisons and young offender institutes, in which the service users will not leave the site, are classified as residential developments then I see no reason why this site should not follow suit.

The point regarding residency was obviously a matter of debate within the application team as the application contradicts itself throughout - the planning application states that there will be no gain, loss or change in the number of residential units currently on site (i.e. none, Planning application form, section 16) while also indicating that 1256 bedspaces will be added with 'type of use' C2A – Secure Residential Institutions (Planning application form, section 17). The hours of operation Planning application form, section 19) also classify the site as a secure residential institution but the Planning proposal statement (Page 66) and travel plan (Page 23) classify the site as non-residential.

Having established that the site is inaccessible by foot and that there is no existing cycle infrastructure (Planning proposal summary, page 13), the baseline modal split in the travel plans (Page 34) assumes that 4% of staff will walk to work and 2% will cycle to the site. A further 4% are expected to catch the bus, which will necessitate a 1-mile walk along the B4011, and 1% by train, which will necessitate cycling or walking from Bicester along the same route. The target of the travel plan, and indeed your own government objectives are that '50% of local trips [will] be undertaken by walking or cycling by the end of the Travel plan monitoring period' (Travel plan, page 34). There are few details as to how these targets will be achieved, aside from perfunctory suggestions such as 'promoting health benefits' (Travel plan, page 30), 'provision of cycling information' (Travel plan, page 30) and 'discounted bus travel' (Travel plan, page 31) and the planning application (section 5) indicates that there is no intention to upgrade existing pedestrian access.

The fact therefore remains that even ignoring the service users, at baseline, 14 staff (assuming 130 staff in total, as stated in the EIA) will be walking or cycling to a site that is 'inaccessible by foot' (Planning proposal statement, page 13), has 'no existing cycle infrastructure' (Planning proposal statement, page 13) and no street lighting (Transport Assessment, page 16), representing a danger to the staff and road users. If the stated targets of 50% of local travel (i.e. from the bus or train station to the site) are achieved, this number will increase to 65 staff by 2030 but yet only a few cycle parking spaces will be built on site. We say 'a few' as the exact number varies between 0 (Planning application form, section 9), 7 (Travel Plan, page 24) or 8 (EIA screening Direction: written statement, page 2).

The traffic count data does not include pedestrian numbers but indicates that currently less than 100 cycles per week use this road. An additional 30 bidirectional users per day (assuming half of the target numbers are cycling) therefore represents a considerable increase and will surely increase collision numbers. The collision data provided cover a particularly restricted region of the route (given that the acceptable walking distance is stated to be 2km) but yet one of the three collisions recorded involved a cyclist. The fact that 'no collisions involved pedestrians' (Transport assessment, page 24) may simply reflect the fact that very few pedestrians currently use this route as it is unsafe to walk along.

Our concerns are further consolidated by the fact that the information regarding available bus routes differs between the Planning proposal summary (Page 13) and Travel plan (Page 17), again indicating a lack of attention. Furthermore, the bus information is incorrect (the 29 bus only serves Bullingdon 2-hourly during the day) and is outdated. The 29/25 services will be consolidated in September and as part of this, there will be no Sunday service to the site further reducing access for staff and service users alike.

We have focused here upon accessibility and road safety but feel compelled to point out that much information in other documents is either contradictory or incomplete and, as such, would urge you to question the suitability of this application. We do understand that this is an emergency application and an issue of importance but this should not excuse the cutting of corners. The applicants have a

duty to service users and staff to ensure that they are fully considered within the planning of the site. As such, we hope that you will recommend a fuller plan be submitted when the appropriate due diligence has been completed.

Yours faithfully,
The Newbury family.