Joseph Marshall and Sarah Marshall

[redacted]

Crown Casework Team

Ministry of Housing, Communities and Local Government

2 Marsham Street

London

SW1P 4DF

By email, copied to Cherwell District Council Planning Department

Dear Sir or Madam,

Re: Consultation Response and Objection to Urgent Crown Development Application – Former Defence Storage and Distribution Centre, Site A, Bicester Garrison, Launton Road, Oxfordshire OX25 1AE (Ref: PCU/RARE/J1725/3378659)

1. Who We Are and Why We Are Writing

We are writing as private residents to object to the above application. This response is submitted in a personal capacity, as the owners and occupiers of [redacted] It is separate from, and additional to, any formal objection submitted by Piddington Parish Council.

By way of background, one of us (Joseph) is a director of a multidisciplinary architectural, planning consultancy and building surveying practice, and works daily advising clients on planning applications, amendments and building control matters across England. We make no claim to any special status in bringing this objection; we write simply as neighbours of this site who happen to have a working, professional understanding of how planning applications of this kind are ordinarily tested. That understanding is precisely why we feel so strongly that this application should not proceed on the evidence currently before you, and why we have set out our concerns below in a structured way, with specific questions we would ask you to address before any decision is made.

2. Summary of Our Objection

Our objection centres on three matters, each of which we consider has been inadequately evidenced given the site's proximity to our village and our home:

- Ground 1: the risk of land contamination and pollution from a site with a long history of military storage use, assessed only by a preliminary desk study;
- Ground 2: flood risk, given the site's own recorded surface water flooding and Piddington's known history of flooding; and
- Ground 3: air quality, given that the evidence submitted addresses construction dust only, not the operational impact of housing up to 1,256 people so close to our village.

We ask that this application be refused, or that determination be deferred, until the evidence gaps identified below have been properly addressed. We set out our reasoning, and the specific questions we would ask you to answer before determining this application, in the sections that follow.

3. Ground One: Land Contamination and Pollution Risk

Site A was previously operated as a Defence Storage and Distribution Centre, used for the storage and release of stores surplus to military use. The only ground contamination evidence submitted with the application is a Preliminary Geo-Environmental and Geotechnical Assessment, and it is exactly that: a preliminary desk study, drawing on a third-party Groundsure report and historical British Geological Survey records, rather than any intrusive site investigation of the ground itself. No borehole or trial pit data from within the site boundary has been produced to confirm what, if anything, remains in the ground following decades of military storage use.

[redacted] we are directly concerned that construction, demolition and future occupation could mobilise contamination that has never actually been tested for, whether into the air we breathe, the watercourses that drain from the site towards the village, or the wider rural land on which many of our neighbours' livelihoods depend. A desk study alone is not, in our view, sufficient evidence to rule this out for a scheme of this scale and this proximity to an inhabited village.

Questions we ask you to address before determination:

- Has any intrusive ground investigation (boreholes or trial pits) been carried out within the site boundary, and if not, why has the application been accepted for determination without one?
- What condition(s), if any, would be attached to secure such an investigation, and would its results be published and open to consultee scrutiny before or only after permission is granted?
- How will contamination risk to controlled waters and to nearby residential receptors, including our home, be assessed and mitigated before construction begins?

4. Ground Two: Flood Risk

The applicant's own Preliminary Geo-Environmental and Geotechnical Assessment records that parts of the site itself are at up to 1 in 30 year risk of surface water flooding, concentrated around the drainage channels that cross it. As residents [redacted], we can say from direct, lived experience that the village and the lanes around it, including Ludgershall Road, already suffer from surface water flooding in heavy rainfall. A development of this scale, involving substantial demolition, new hardstanding and modular construction across a site that is already known to flood, immediately upstream and adjacent to a village that also floods, is precisely the kind of proposal that would ordinarily require a detailed, site-specific flood risk assessment and a proven drainage strategy before permission could responsibly be granted.

Questions we ask you to address before determination:

- Has the drainage strategy been tested against the realistic combination of the site's own recorded flood risk and Piddington's known local flooding history, rather than assessed in isolation?
- Have the Lead Local Flood Authority and the relevant Internal Drainage Board been consulted, and if so, what concerns, if any, have they raised?
- Will the drainage strategy be fully agreed and approved before permission is granted, or only by condition afterwards, and if the latter, what safeguards exist should it later prove inadequate?

5. Ground Three: Air Quality

The air quality evidence submitted takes the form of a screening technical note assessing construction dust risk against the Institute of Air Quality Management's dust methodology. That is a world away from a proper assessment of the air quality impact of housing up to 1,256 people on this site on an ongoing, operational basis, including the associated vehicle movements, plant, generators and wastewater treatment infrastructure, all within close range of our homes and the wider village. We are concerned about the cumulative effect on the local atmosphere that we and our neighbours rely on for our health and quality of life.

Questions we ask you to address before determination:

- Will a full operational air quality assessment be required and made available for scrutiny before this application is determined, rather than a construction dust screening note alone?
- How will the cumulative, long-term air quality impact of a facility of this size, including traffic, plant and infrastructure, be assessed and mitigated?

6. Cumulative Impact [redacted]

[redacted]

7. Why This Should Not Be Decided on the Evidence Currently Submitted

We want to be direct about why we feel compelled to write personally, in addition to any collective objection. In our professional experience of the planning system, an application with this scale of unresolved contamination, flood risk and air quality uncertainty, proposed this close to an inhabited village, would not succeed if it were brought forward through the ordinary Town and Country Planning Act process, where full technical scrutiny, statutory consultation periods and the opportunity for independent testing of evidence are the norm. It is only because this application has been brought forward under the urgent Crown Development procedure, on a compressed timescale, that these gaps in the evidence base have not yet been tested in the way they ordinarily would be. We do not think the urgency of the wider policy objective should be allowed to excuse the absence of evidence that would, in any other circumstances, be required before a decision of this magnitude could properly be made.

8. Requested Outcome

We ask that this application be refused, or at the very least that determination be deferred until proper, site-specific evidence, including an intrusive ground investigation, a tested flood risk assessment reflecting both the site's and the village's known flooding history, and a full operational air quality assessment, has been obtained and made available for scrutiny. We would also ask that the specific questions set out above are answered directly, and that those answers are made available to us and to other consultees, before any decision is made.

We would be grateful for acknowledgement of this letter as a formal representation against the application, and we ask that it be taken fully into account, together with the specific questions raised, in the determination of PCU/RARE/J1725/3378659.

Yours faithfully,

Joseph Marshall BSc(Hons)

Sarah Marshall

[redacted]