Dear Sir or Madam,

Re: PCU/RARE/C3105/3378843 – MOD Bicester Site A

I am writing to make a representation regarding the Home Office application for the temporary use of MOD Bicester Site A as non-detained asylum accommodation for up to 1,256 people.

My objection is not to the principle of providing appropriate accommodation for people seeking asylum. It is to this particular proposal, at this scale and on this site, and to its determination through the exceptional Urgent Crown Development procedure before fundamental questions concerning its feasibility, safety, deliverability and effects have been resolved.

Having considered the published application material, subsequent Government statements and Cherwell District Council's detailed planning assessment, I believe several important matters require further scrutiny before the application is determined.

1. The case for exceptional urgency

Government guidance states that Urgent Crown Development is an exceptional procedure for nationally important development that is genuinely required as a matter of urgency. The applicant is required to demonstrate an accelerated operational timeframe unlikely to be feasible through other application routes, including Crown Development, together with the likely consequences of not securing a decision within that accelerated timeframe.

The Home Office's Statement on National Importance states that planning permission was required by late summer to maintain the programme critical path. Its stated programme assumptions were submission of the Urgent Crown application in July and approval by late August 2026.

Those milestones have now passed. The application was not validated until 2 September and the public representation period did not commence until 7 September.

This does not necessarily mean that the operational need has ceased to be urgent. It does, however, mean that the programme relied upon to demonstrate urgency has materially changed.

In addition, in its formal response dated 9 September 2026 to Parliamentary Petition 777752, the Home Office stated that no final decision would be taken regarding the proposed MOD sites until all necessary arrangements, assessments and approvals were in place and all factors had been properly considered. Its current MOD Bicester factsheet states that detailed feasibility assessments could take several months.

Recent Parliamentary responses have also confirmed that suitability assessments remain ongoing. When asked for the current expected operational date for MOD Bicester, the Home Office did not provide one.

A further Parliamentary answer is relevant to that question. In response to Written Question 29084, answered on 15 September 2026, the Minister of State for Border Security and Asylum was asked on what date ministerial approval had been given to pursue the use of Site A at MOD Bicester for asylum accommodation. The Minister stated that no decision had been made and that, because no decision had been taken, “no ministerial approval has been given to pursue the use of the site for asylum accommodation”.

Planning permission, feasibility work and business-case processes can legitimately proceed in parallel before a final operational or investment decision is taken. However, no ministerial approval has been given to pursue use of the site, feasibility and governance work remains ongoing, no current operational date has been identified, and the programme is already beyond its July submission and late-August approval assumptions. I therefore respectfully ask the Secretary of State to establish the current critical path, including the operational date now relied upon, the consequences of failing to meet it, and why the ordinary Crown Development procedure could not accommodate the revised programme.

The national importance of asylum accommodation may establish a compelling need for accommodation nationally. It does not, without further evidence, establish why this particular application must continue to be determined through the exceptional urgent procedure on the timetable now before the Secretary of State.

2. Scheme definition and environmental assessment

The clearest inconsistency identified by Cherwell District Council concerns the maximum development for which permission is sought and the development assessed for environmental effects.

The submitted parameters plan allows operational development up to 12 metres high. By contrast, the Secretary of State's Environmental Impact Assessment screening was expressly undertaken on the basis of modular units no more than two storeys or 6 metres high, and the applicant's landscape assessment models a 6 metre development.

That is not merely a drafting issue. Unless the parameters plan is reduced to the assessed 6 metre envelope, permission could authorise a materially larger development than the one environmentally screened and landscape assessed.

I therefore ask the Secretary of State to ensure that the development for which permission is sought, the environmental screening exercise and the supporting technical assessments all relate to the same clearly defined maximum development before the application is determined.

The Council's assessment also raises the broader question of whether the scheme is sufficiently defined for an informed planning judgement.

The drawing package does not include a proposed detailed site layout, floor plans, elevations, sections, finished levels, detailed landscape or lighting proposals, or a detailed access and servicing layout.

A proposal of this nature may legitimately retain some flexibility, but the undefined layout prevents reliable assessment of the relationship between accommodation and healthcare facilities, wastewater infrastructure, drainage, emergency access, pedestrian routes, security, fire safety, landscape effects and living conditions.

Where material information remains absent or inconsistent, I ask that it is supplied and subjected to appropriate consultation before a final planning judgement is made.

3. Utilities and wastewater infrastructure

The Utilities and Infrastructure Assessment identifies significant matters that remain unresolved.

It states that existing capacities within utility networks are yet to be determined and that temporary solutions have been allowed for until full requirements can be met. It also recommends further surveys before construction.

The existing mains-water network is described as being of limited capacity relative to concentrated development, while the proposed potable-water system would remain dependent upon available mains capacity.

For electricity, the condition, capacity and configuration of the existing network have not been verified. The assessment states that, because of uncertainty over available power, the present proposal assumes that existing electrical infrastructure cannot presently be relied upon and therefore incorporates temporary and/or permanent generator provision.

There are particularly important uncertainties concerning foul drainage.

Cherwell District Council's planning assessment records that the final foul-water strategy remains unconfirmed. Initial occupation could involve cesspool storage and tankering, but the applicant's own drainage material indicates that tankering would not be viable at full occupancy.

Bicester Wastewater Treatment Works has been identified as a possible receiving facility, subject to capacity and appropriate arrangements, but no confirmed permanent solution has yet been demonstrated.

The alternative of constructing a new on-site wastewater treatment works would itself require resolution of matters including its design and capacity, receiving watercourse, discharge arrangements, environmental permitting, land rights, sludge disposal, flood resilience, noise and odour controls and delivery programme.

Conditions can properly secure engineering detail once an acceptable solution has been shown to exist. Here, however, the unresolved issue appears to be whether any wastewater solution is technically feasible, consentable and deliverable at the proposed scale.

This is particularly relevant in light of the Government's 9 September statement that former military accommodation is intended to be largely self-sufficient and that essential services will be provided on site.

I therefore ask the Secretary of State to establish, before determination, that at least one technically feasible, consentable and deliverable wastewater solution exists which is capable of supporting the proposed population, and that any necessary utility provision can similarly be delivered with an acceptable level of certainty.

4. Transport, accessibility and safe movement

The Transport Assessment itself acknowledges that the location is "not ideal" from the perspective of accessibility by sustainable travel modes.

There are no footways at the northern site access. At the southern access the available footways are approximately one metre wide, with no formal dropped kerbs or crossing facilities, and there are no existing public footpaths through or accessible from the site.

The assessment identifies limited amenities near the site and recommends that service users access surrounding settlements by Home Office-provided minibuses because of the absence of appropriate pedestrian infrastructure serving the site.

On-site facilities and shuttle transport can reduce travel demand. They do not remove the need to plan for residents who are not detained and remain free to enter and leave the site.

Cherwell's subsequent assessment reinforces this concern. It identifies the absence of a quantified pedestrian-distribution assessment, detailed time-of-day profile or sufficient sensitivity testing for circumstances in which shuttle provision is unavailable, full or otherwise insufficient to meet demand.

A sign-in or sign-out system can record movements but cannot prevent them. Similarly, advice to residents, the provision of high-visibility clothing and encouragement to use organised transport do not themselves constitute a safe pedestrian network.

The practical acceptability of this relatively isolated location therefore depends substantially upon the proposed shuttle and minibus service.

I respectfully ask the Secretary of State to consider whether sufficient evidence has been provided regarding the capacity, frequency, operating hours, destinations, resilience and anticipated demand for that service, and whether assumptions about travel behaviour are sufficiently robust for a non-detained population potentially numbering 1,256 people.

Where the acceptability of the site depends materially upon managed transport provision, I believe that provision should be sufficiently defined and capable of being secured for the

decision-maker to be confident that the assessed transport and accessibility impacts reflect how the development would operate in practice.

5. Drainage, flooding and environmental constraints

The Utilities and Infrastructure Assessment records evidence of ponding and localised flooding observed despite dry conditions.

It describes existing surface-water systems as poorly maintained and largely non-operational in places and states that further surveys are required to establish outfall locations, connectivity, capacity and condition.

The proposed surface-water strategy therefore remains based in part upon assumptions arising from limited surveys and incomplete site information and requires verification through further investigation and stakeholder consultation.

Detailed drainage design can continue after permission, but baseline information needed to decide whether the development is acceptable cannot be deferred. Given the scheme's scale and the incomplete evidence, the Secretary of State should distinguish clearly between those two categories.

I therefore ask that particular weight be given to the responses of the relevant drainage, environmental and other statutory consultees, including any concerns as to whether the information presently available is sufficient to support an informed planning judgement.

The same principle should apply to ecological and environmental mitigation. Conditions may appropriately secure detailed implementation once an acceptable solution has been demonstrated, but they should not substitute for information necessary to establish that an acceptable solution exists.

6. Deliverability and duration of the proposed use

The stated duration and the continuing feasibility work both bear directly on whether the proposal has been defined and assessed as a deliverable temporary use.

The application seeks a ten-year temporary use. However, the Transport Assessment says the proposal is initially for ten years and that the facilities are being designed to operate for longer if required. The Home Office's updated factsheet says the site would be used for a minimum of ten years.

That does not make the application internally inconsistent, but it shows that occupation beyond the initial planning period is already contemplated. I ask the Secretary of State to ensure that the description of the use as temporary, and the assessment of its infrastructure, transport, environmental and community effects, reflect its reasonably foreseeable duration and character.

Deliverability is also unsettled. The Home Office continues to describe MOD Bicester as subject to feasibility, due-diligence, design, assurance and governance processes, with no final decision to use the site. Parliamentary answers state that accurate costings are still being assessed and that business cases and approvals will be sought when that work is complete.

Planning can proceed in parallel with those processes, but the decision must still concern a sufficiently defined and realistically deliverable scheme. That matters because acceptability depends on substantial future provision for utilities, wastewater, transport, security, healthcare and welfare.

Where those measures depend upon expenditure, procurement or approvals not yet secured, I ask the Secretary of State to decide whether they are sufficiently certain to be relied upon for planning purposes.

7. Healthcare, welfare and local-service impacts

The application provides for health and welfare facilities and relies in part upon the site being substantially self-contained.

The Home Office's current factsheet states that efforts will be made to minimise impacts upon local health services and that healthcare provision will be determined in discussion with health partners. Its 9 September response to Parliamentary Petition 777752 similarly states that it is engaging with NHS partners, local authorities and other bodies about service pressures and community impacts.

Cherwell District Council's assessment nevertheless identifies a number of important matters that remain undefined.

These include the absence of a confirmed commitment from an Integrated Care Board or named healthcare provider, specified staffing levels and operating hours, and sufficiently detailed arrangements relating to areas such as mental health and trauma, pharmacy, infectious disease, emergency treatment pathways and patient transport.

There is also the question of residual effects upon ambulance services, primary care and acute hospital services if on-site provision is unable to meet particular needs.

Detailed commissioning and staffing are principally operational matters. The planning issue is whether the assumption that the site will be substantially self-contained is robust enough to support the assessment of effects on surrounding services. Identifying space for healthcare is not the same as demonstrating a commissioned and deliverable service.

I therefore ask the Secretary of State to give substantial weight to evidence from NHS bodies, local authorities and other competent consultees concerning likely residual demand upon healthcare and other services.

This is important both for existing communities and for the health and welfare of the people who may ultimately be accommodated at the site.

8. Outstanding consultee evidence and the timing of determination

Cherwell District Council's detailed planning assessment makes clear that a number of important statutory and specialist consultation responses remain central to the assessment of the proposal.

These include matters within the expertise of bodies responsible for highways, drainage, wastewater, environmental protection, ecology, healthcare, policing and other public services.

Given the scale and nature of the proposal, I do not believe it would be appropriate for the application to be determined before material responses from the relevant expert bodies have been received and properly considered.

If those responses lead to substantial changes in the proposal, identify new mitigation requirements, or result in the submission of material additional information, I respectfully ask that this information is published and that Cherwell District Council, relevant consultees and the public are given a reasonable opportunity to comment upon it before determination.

An accelerated procedure should not result in material technical evidence being received too late for meaningful scrutiny.

At its meeting on 16 September 2026, Cherwell District Council's Planning Committee unanimously resolved to accept the officer report and authorised delegated finalisation of the Council's formal consultation response, with members' further comments to be incorporated. The detailed assessment before the Committee recommends a formal objection to determination and to any grant of planning permission on the evidence presently available, requests that no determination is made until the outstanding consultee responses and additional information have been received and properly

considered, and asks that planning permission be refused if MHCLG nevertheless determines the application without those deficiencies being resolved. Although the Council is not the determining authority, its professional assessment and the Committee's unanimous resolution should be afforded substantial weight.

Conclusion

I appreciate the very real challenge facing Government in providing appropriate asylum accommodation and reducing dependence upon hotels. Solutions clearly have to be found.

That makes it particularly important that decisions about large accommodation sites are demonstrably evidence-led.

The relevant question is not whether asylum accommodation should be provided in Oxfordshire. It is whether MOD Bicester Site A, accommodating up to 1,256 people for at least the proposed ten-year period, has been demonstrated to be an appropriate, safe, sustainable and deliverable location, and whether the exceptional Urgent Crown Development procedure remains justified for this particular scheme on the timetable that now exists.

The Government's own documentation identifies unresolved matters concerning utilities, wastewater, drainage and transport. Cherwell District Council's professional planning assessment identifies further concerns about the definition of the scheme, environmental assessment, healthcare provision and the extent to which key matters remain dependent upon further evidence and consultation. Its Planning Committee unanimously accepted the officer report and authorised finalisation of the Council's response.

At the same time, wider feasibility, costing and assurance work remains ongoing, no ministerial approval has been given to pursue use of the site, and the programme originally relied upon to establish the need for an Urgent Crown determination has slipped beyond its stated July submission and late-August approval milestones.

I therefore respectfully ask that the application is not determined until:

1. the outstanding statutory and specialist consultee responses have been received and considered;

2. the fundamental feasibility issues concerning utilities, wastewater, transport, drainage, healthcare and other necessary infrastructure have been satisfactorily addressed;

3. the development for which permission is sought is sufficiently defined and consistent with the environmental and technical assessments supporting it;

4. the current critical path, present operational imperative and continuing justification for use of the Urgent Crown Development procedure have been clearly established; and

5. any material additional information has been published with a reasonable opportunity for Cherwell District Council, relevant consultees and the public to comment upon it.

If the Secretary of State nevertheless decides to determine the application on the evidence presently available, I do not believe that evidence is sufficient to demonstrate that the proposed development is safe, sustainable, properly serviced and acceptable at this location. On the evidence currently available, I respectfully submit that planning permission should therefore be refused.

Yours faithfully,

[redacted]