From: [redacted]
To: Crown Casework
Cc: Jo Grey
Subject: Objection to Urgent Crown Development Application: MOD Bicester (Site A)

[redacted]

To Whom it May Concern

Objection to Urgent Crown Development Application — MOD Bicester (Site A), Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE Representation period: 7–17 September 2026

I am writing as a resident of [redacted] to object, on planning grounds, to the Home Office's Urgent Crown Development application for the temporary (2027–2037) change of use of MOD Bicester Site A to provide non-detained asylum accommodation for up to 1,256 single men.

I want to be clear about the spirit in which this objection is made. I do not object to my community welcoming people seeking asylum — Bicester and the surrounding villages have a strong record of doing exactly that, and I support continued efforts to end the use of costly and unsuitable hotel accommodation.

My objection is to *this* proposal, on *this* site, brought forward through *this* process, because I do not believe it will serve either local residents or the asylum seekers who would be housed there. I set out below the planning issues I consider must be weighed heavily against the application, with reference to the statutory framework and relevant case law.

1. Process and the duty to consult properly
Cherwell District Council has stated that it was not consulted on these proposals and learned of them only shortly before they became public. A short representation window, running in early-to-mid September, is a wholly inadequate opportunity for a community of this size to engage with a scheme of this scale and complexity — particularly given that the site has, on public reporting, been under consideration by the Ministry of Defence and Home Office since at least November 2025.

Even though this application proceeds via the Urgent Crown Development route rather than through Cherwell District Council, the Secretary of State remains obliged to have regard to relevant planning considerations, and basic public law fairness principles still apply to how the process has been run. The established common-law test for a lawful consultation — that it be undertaken at a formative stage, with sufficient information and adequate time to give intelligent consideration and an intelligent response — derives from *R v Brent London Borough Council, ex parte Gunning* (1985) 84 LGR 168, and was endorsed by the Supreme Court in *R (Moseley) v Haringey London Borough Council* [2014] UKSC 56.

I submit that a truncated, unannounced ten-day window, following many months of undisclosed preparatory work, falls short of that standard, and that the Secretary of State should not determine the substantive application until a fair opportunity for representations — including from the local planning authority — has genuinely been afforded.

2. Suitability of the location and sustainability of the development
The National Planning Policy Framework requires new development to be directed to sustainable locations, with good access to services, healthcare, transport and support networks. Site A is a former defence storage and distribution facility with no history of residential use, limited public transport, and no established pedestrian or cycle connectivity to the services that 1,256 additional residents — and the staff needed to

support them — would require.

This is not a technical quibble: the Court of Appeal's judgment in *Braintree District Council v Secretary of State for Communities and Local Government* [2018] EWCA Civ 610 confirms that "isolation" for planning purposes is a qualitative, not merely a distance-based, question — it turns on practical, day-to-day access to services and community life.
On that test, Site A is manifestly isolated. Locating a facility of this scale away from GP surgeries, mental health services, legal aid providers, places of worship, and public transport does not reduce pressure on public services; it relocates and concentrates that pressure onto a rural area never designed to absorb it, while simultaneously cutting the site's future residents off from the very services and community contact that support integration and wellbeing.

3. Ecology and habitats
The application site and its surroundings include open, long-undisturbed former military land of the kind that frequently supports notable biodiversity — invertebrates, bats, and ground-nesting birds in particular are commonly associated with disused MOD sites of this type. I have seen no evidence in the published documentation of a full and current ecological assessment commensurate with a scheme of this scale, including construction of new modular accommodation, demolition of existing structures, and associated security and access infrastructure.

Where a development may affect a European protected site or protected species, the precautionary approach required under the Conservation of Habitats and Species Regulations 2017 applies: an appropriate assessment must remove reasonable scientific doubt as to the absence of significant adverse effects before consent is granted — the standard confirmed by the Court of Justice in *Sweetman v An Bord Pleanála* (Case C-258/11) and applied domestically in *Wealden District Council v Secretary of State for Communities and Local Government* [2017] EWHC 351 (Admin).

More broadly, the adequacy of any screening opinion as to whether environmental impact assessment is required is itself a matter the courts will scrutinise closely, as in *R (Champion) v North Norfolk District Council* [2015] UKSC 52. Given the urgency being claimed for this application, I am concerned that ecological survey work may not have been carried out across appropriate seasons, and that the statutory biodiversity net gain requirement under the Environment Act 2021 has not been demonstrably addressed.

I ask the Secretary of State to require, and to publish, a full ecological impact assessment before any decision is made, and not to treat "urgency" as a basis for curtailing statutory environmental safeguards.

4. Impact on local residents
Oakley and the neighbouring villages are served by GP practices, primary schools, and community facilities that are already stretched. A development of this scale — bringing not only 1,256 residents but the staffing, security and logistics operation needed to run it — will place real additional pressure on local infrastructure that has not, on the evidence published to date, been assessed.

The NPPF's social objective requires that the planning system support strong, healthy communities with accessible services; that cuts both ways here, since it is not only existing residents but the incoming population who would be inadequately served by this site.

Oakley is 4 miles from the site and located just across the Buckinghamshire border. Many of the closest communities are within Bucks – but the consultation and impact on Bucks services seems largely ignored.

5. Impact on the asylum seekers who would live there
I raise this not as a matter of charity but because it is, in my view, a material planning

consideration going directly to the suitability of the site for its intended use.

Warehousing over a thousand men in a remote, poorly connected former storage depot for up to ten years, with limited access to legal advice, healthcare, education, employment routes, and ordinary community contact, is a recipe for poor mental health and isolation, as UNHCR and refugee-sector organisations have repeatedly found in relation to comparable large-scale, isolated sites elsewhere in the UK and Europe.

A planning decision that ignores the wellbeing of the people who will actually occupy a development is not a sound one. I ask that the Secretary of State weigh the suitability of this site for the people it is meant to accommodate as seriously as its impact on the settled community.

Conclusion
For the reasons above — an inadequate and unfair consultation process, an unsustainable and isolated location, an apparently deficient ecological assessment, unaddressed impacts on local infrastructure, and unaddressed impacts on the wellbeing of the prospective residents themselves — I object to this application in its current form.

I ask that the Secretary of State either refuse the application or defer determination until: (a) a fair and adequate consultation has been carried out, including proper engagement with Cherwell District Council; (b) a full, up-to-date ecological survey and appropriate assessment has been completed and published; and (c) a proper assessment of impacts on both the local community and the wellbeing of prospective residents has been undertaken and made public.

I would welcome the opportunity to discuss these concerns further and to see the evidence base for the application published in full.

Kind regards

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