From: [redacted]
To: Crown Casework
Subject: Formal objection – MOD Bicester Site A – PCU/RARE/C3105/3378843 – 26/01833/CROWN
Date: 16 September 2026 22:24:41
Attachments: MOD Bicester Formal Planning Objection.pdf

Formal objection to MOD Bicester Site A

Urgent Crown Development application PCU/RARE/C3105/3378843

Cherwell District Council reference 26/01833/CROWN

[redacted]

16th September 2026

To: The Secretary of State for Housing, Communities and Local Government
Via the Crown Casework Team

I formally object to the Home Office application for the ten-year use of MOD Bicester Site A as non-detained asylum accommodation for up to 1,256 people. I ask that permission be refused in its present form. Alternatively, determination should be deferred to allow the evidence and safeguards identified below to be resolved and properly examined by consultees and the public. [1]
My principal concerns are safe access, the delivery of essential infrastructure, drainage and protected-site safeguards, and reliance on operational arrangements whose effectiveness needs to be demonstrated before occupation. The national need for accommodation must be weighed against the suitability of this particular site and the consequences of its proposed capacity and duration.

1 Fair scrutiny and my experience as a [redacted]
My wife is a [redacted] Over almost two years, we have spent more than £25,000 in professional fees seeking permission for a single wheelchair accessible home in [redacted] within the same district. Our current application, [redacted], remains awaiting a decision. That history concerns our overall efforts to secure an appropriate home; I am not suggesting that the current application itself has been pending for two years.
We have had to engage with the planning process and its detailed requirements despite the pressing disability-related need for our home. I expect a government proposal affecting far more people, over a ten-year period, to receive scrutiny proportionate to its potential impacts. Government ownership should provide no reason to accept weaker evidence or less dependable safeguards.
I recognise that legislation provides a distinct Urgent Crown Development procedure. My request is for equally rigorous assessment of planning merits, transparent reasons and compliance with applicable requirements. Government guidance expressly requires consideration of the planning merits and relevant matters raised by the council and consultees. [2]
My expenditure and personal circumstances explain why this matters to me; the material planning grounds for my objection are set out below. I am not asking for the outcome of this application to be linked to the outcome of my own.

2 A meaningful opportunity to examine the proposal
The published representation period runs from 7 to 17 September 2026. The application involves a substantial collection of technical documents. I request an extension allowing at least 21 days of public consideration of the complete material evidence, with a further opportunity to respond to any material revisions. This is a request for a fair and proportionate period, rather than an assertion that the ordinary 21-day procedure automatically applies here. [1]
Cherwell states that it was not consulted before the proposals were announced and learned of them only shortly beforehand. That makes a proper opportunity for subsequent scrutiny particularly
 [3] Please explain why a longer representation period would frustrate delivery, given that

consent is sought for a decade of operation.
Please publish substantive consultee responses and any material technical clarifications used in reaching the decision. Where lawful security redactions are necessary, provide sufficient non-sensitive information to explain the assumptions, predicted impacts and mitigation. An independent technical adviser should examine material information that the public cannot inspect, with a publishable account of the conclusions. [2]

3 Pedestrian safety and dependence on organised transport

The Transport Assessment identifies no footways at the northern access. It describes approximately one-metre footways around the southern access and no formal dropped kerbs or crossing facilities there. Its section 3.4 recommends that residents use Home Office minibuses because pedestrian infrastructure serving the site is inadequate. A short distance to a village does not establish a safe route. [4]
For non-detained accommodation, journeys on foot are foreseeable. On-site facilities and advice to use a minibus cannot establish that nobody will walk outside the site. Please demonstrate a safe practical response to that foreseeable behaviour, including after dark and when organised transport is unavailable.
The submitted Travel Plan expressly addresses staff and visitors only, in section 1.2.2. [14] Please identify the equivalent arrangements governing resident travel and explain how demand, capacity and journeys outside scheduled services have been assessed. A plan for employee commuting cannot, by itself, resolve the access needs of the people accommodated here.
Before occupation, any permission should secure the necessary access works and a funded transport service with defined capacity, hours, destinations, accessible vehicles, monitoring and a fallback for breakdowns or unmet demand. These safeguards should apply throughout operation and be assessed against the maximum occupancy.
Please obtain the highway authority's explicit conclusions on pedestrian safety and on the assumptions underlying the traffic assessment. Under the current national policies TR3, TR4 and TR6, sustainable access and highway safety require substantive assessment; an unacceptable highway-safety impact is a separate refusal ground from severe congestion. [5]

4 Wastewater arrangements and an effective occupancy limit

The Drainage Design Statement, section 9.2, identifies uncertainty over municipal treatment and connection capacity. It contemplates initial tankering but states that this is not viable for the full number of residents anticipated. Its proposals for on-site treatment require further design and permitting. [6]
This requires a clear limit on the occupancy that an interim solution can safely support. Before initial occupation, please establish the receiving facility's written acceptance, available capacity, storage provision, collection frequency and contingency arrangements. Before expansion, a suitable permanent solution should be operational and capable of serving the increased population.
Any interim tankering approval should specify its maximum duration and supported occupancy. Its vehicle movements, noise and spill controls must be included in the assessment. If a permanent solution cannot be delivered, the permitted population must remain within the demonstrated capacity of the interim arrangements. A general promise to settle details later would leave the central infrastructure dependency unresolved.

5 Protected-site safeguards and surface water flooding

Natural England's 23 July 2026 advice identifies a possible hydrological connection with Arncott Bridge Meadows SSSI. It asks for evidence that the existing hydrological regime will not be adversely altered, suitable runoff treatment and further consultation on drainage details or alternative foul-water arrangements. The letter was discretionary pre-application advice, not a final statutory response. [7]
I acknowledge that the EIA screening written statement records later advice on 11 and 13 August, including Natural England being content for the development to move forward without damaging the SSSI's interest features. It also records acceptance of the explanation of interim tankering. I therefore do not assert that Natural England maintains an outstanding objection. [8]
Please publish the later advice and identify precisely which assumptions and safeguards support it. The final proposal and conditions should demonstrably reflect those requirements, including the actual

foul-water solution, discharge location, runoff treatment and arrangements for failure or accidental spillage. Please confirm that the relevant bodies have assessed the scheme actually being authorised.
The Flood Risk Assessment recognises surface-water flood risk and recommends attention to flow paths, drainage condition and groundwater investigation. It regards the site as predominantly Flood Zone 1; my objection is not that the entire site is in a high river-flood zone. [9]
Please demonstrate that the permitted layout will preserve necessary overland flow routes and provide safe access and evacuation, with suitable levels and drainage maintenance. The effects of blockage, pump failure and extreme rainfall should be addressed for each occupied phase. Existing drainage should not be assumed to provide effective protection without adequate verification.

6 Utilities and effects on public services
The Utilities and Infrastructure Assessment identifies unverified electrical capacity and anticipates generators because existing supply cannot be relied upon. It also identifies incomplete information on foul-water networks and treatment capacity. [10] The decision should establish the infrastructure that can actually support the permitted population, with commissioning and resilience arrangements secured before use.
Healthcare is a separate delivery issue. The Equality Impact Assessment describes on-site provision but leaves its exact scope subject to discussion with local health authorities. It also describes shuttle buses to nearby urban centres as something that may be considered. These provisions need to be reconciled with the firm reliance on self-sufficiency and organised transport elsewhere in the application. [11]
Please publish the health bodies' assessment of likely demand and an agreed delivery plan. This should distinguish on-site care from services requiring outside referral and identify funding, staffing, opening hours and the consequences for existing users. Ambulance, fire and other emergency-service arrangements need equivalent clarity. I do not assume that all demand will fall on local services; I ask for the residual demand to be established and provided for.
National policy HC3 addresses infrastructure needed for significant additional populations and its timely delivery. [5] A reserved area for a medical facility does not, by itself, demonstrate that a staffed service will be operating when residents arrive.

7 Ten years of use and limits on deferred design
Ten years is a substantial period for nearby communities and those living on the site. The temporary label should carry weight only to the extent that a defined end date, cessation of use and restoration Richard Edwards | MOD Bicester Site A | 3can be secured. Please justify the duration separately from the immediate need for additional
accommodation.
The Planning Proposal Statement, section 1.9, adopts a maximum-parameters approach, described as a Rochdale Envelope, with detailed design envisaged through conditions. It also refers to the earlier permission for accommodation for 750 people. [12] Neither point establishes the acceptability of every layout or of the proposed increased capacity.
Please explain how the assessed worst case covers all layouts that could be approved later, including buildings, plant, roads and open space. Essential limits must be identifiable in the permission. If a design change falls outside the assessed assumptions, it should receive the necessary further assessment rather than being treated as a minor detail.
The earlier permission should be evaluated in its proper context, including any access improvements and operational safeguards on which it depended. Please explain what weight it warrants for today's substantially different proposal. A historic approval cannot replace assessment of current conditions, impacts and policy.

8 Amenity and safety during construction and operation
The submitted Noise Impact Assessment primarily examines the effect of existing transport noise on the proposed accommodation. [13] Please identify the evidence assessing noise created by the development at existing homes and other sensitive locations, including generators, treatment equipment, deliveries and recreation. Where that assessment is elsewhere in the application, it should be expressly identified in the decision report.
Please secure appropriate noise limits, plant locations and mitigation before operation. Lighting

should have an assessed design controlling glare, spill and effects on the rural setting and wildlife. Wastewater treatment should have suitable odour safeguards. Any substantial operational source should be covered by the assessed scheme and its enforceable controls.
For construction, please secure appropriate delivery routes, timing, traffic management and protection against dust and disturbance before the relevant works. Confirm the necessary investigation and management of contamination, asbestos and unexploded ordnance before ground disturbance or occupation, with verification of the completed measures. These requests concern the suitability of the land and the effects of development; separate regulatory controls should be respected rather than duplicated.

9 Assessment against current policy and the planning balance
Please identify the current development plan and assess this proposal against its relevant policies, including transport, flood risk, drainage, biodiversity, landscape, amenity and infrastructure. The applicant discusses policies including ESD 6, ESD 7, ESD 8, ESD 10, ESD 13, ESD 15 and INF 1. [12] Any conflict and the weight attached to it should be explicit.
The August 2026 National Planning Policy Framework replaced the December 2024 version and applies to decision-making from publication. [5] Please assess the current national decision-making policies and explain any consequential change to the applicant's analysis. References in earlier technical reports to former paragraph numbers should not obscure the policy tests now applicable.
I recognise the public interest in providing accommodation and reducing reliance on hotels. The decision must still explain why the benefits of this site, at this scale and for this duration, outweigh the identified disadvantages and risks. The national-importance and urgency decisions do not themselves establish acceptable access, infrastructure or environmental impacts.
Richard Edwards | MOD Bicester Site A | 4I acknowledge the published direction that this is not EIA development. My request is that any
material new evidence or change affecting that conclusion be properly considered, including dependencies on mitigation and cumulative effects. A negative EIA screening decision does not itself determine the planning merits. [8]

10 Action requested
I ask the Secretary of State to refuse permission in its present form if safe access and essential infrastructure cannot be demonstrated and secured. If further evidence could resolve these issues, please defer determination, publish the material evidence and allow a meaningful further opportunity to comment.
If permission is nevertheless granted, the following safeguards should be expressly secured through appropriate conditions or other lawful mechanisms:

- A maximum total occupancy of 1,256, together with lower phase-specific limits tied to demonstrated infrastructure and service capacity.
- No occupation of a phase until its necessary access, transport, wastewater, drainage, water, power, healthcare and emergency arrangements are operational.
- A defined limit on interim tankering, with expansion prevented until the permanent wastewater solution is operational.
- Approved limits and mitigation for plant, noise, odour and lighting, and the necessary ecological and contamination safeguards.
- A definite expiry date, cessation of the authorised use and an approved timetable for removal and restoration.
- Clear responsibility for monitoring compliance, public reporting of material breaches and corrective action within specified timescales.

Each control must be necessary, relevant, precise and reasonable, and capable of being complied with and enforced. [5] Where a measure depends on another body, its delivery must be established through the appropriate mechanism. Essential safeguards should survive changes of operator and cannot depend solely on an unenforceable undertaking.
Please address the principal grounds in this representation in the published decision reasons, including any conclusion that a requested safeguard is unnecessary. My experience seeking an accessible home has reinforced the importance of careful planning assessment. I ask the Government to apply that same seriousness to the evidence and consequences of its own development.

Yours faithfully,

[redacted]

[redacted]

The references below identify the official published evidence used in this objection. Requests for additional evidence or controls are my representations, not assertions that the relevant consultees have objected.

[1] Official application and representation arrangements
[2] Government guidance on Crown Development and Urgent Crown Development paragraphs 062 and 063
[3] Cherwell District Council information on the Home Office proposals
[4] Transport Assessment sections 3.4 and 3.6
[5] National Planning Policy Framework August 2026 including DM6 TR3 TR4 TR6 HC3 and Annex A
[6] Drainage Design Statement sections 9.2 and 9.4 to 9.9
[7] Natural England drainage advice dated 23 July 2026
[8] EIA screening direction written statement particularly PDF pages 9 to 11 and 16
[9] Flood Risk Assessment sections 6.1 and 6.2
[10] Utilities and Infrastructure Assessment sections 3 and 4
[11] Equality Impact Assessment particularly PDF pages 16 and 17
[12] Planning Proposal Statement sections 1.9 2.14 to 2.16 and 5
[13] Noise Impact Assessment sections 4 to 6
[14] Travel Plan section 1.2.2

[redacted]