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15th September 2026

Dear Sirs

Having reviewed the published application material for the proposed 10-year temporary use of MOD Bicester Site A as accommodation for up to 1,256 asylum seekers, there are a number of planning objections that I would like to raise.

These are focused on the unsuitability of the location as it is not a sustainable location so not in line with the National Planning Policy Framework (NPPF) and also the inadequacy of the highway assessment as that is my area of expertise.

I have a degree in planning and I am a chartered transport planner with over 30 years of experience, having previously been the planning manager for Buckinghamshire County Council and a Highways Development Management Manager.

I note the that the status of the future occupants, is not a material planning consideration. However, I feel that it is the duty of the Government to provide a suitable environment and location that would create thriving well adjusted future residents of the UK.

The proposed development at MOD Bicester Site A would be totally isolated to point that this could be considered a prison like environment. This isolation means that the people who live there will be disconnected from wider support communities and facilities. They will not be able to access the requirements that they need to help support them, mentally and physically, that would be required to help them grow and thrive as future upstanding residents of the UK.

Planning Grounds for Objection

1. Unsustainable Location

The proposal would accommodate up to 1,256 residents, the equivalent of a small village or a significant application for residential use, in a largely self-contained facility. However, the application does not provide for the minimum connectivity requirements to support an application of this size.

The site is accessed from the B4011, a higher speed road, in an isolated location 5.2 miles from the nearest town of Bicester and 5.2 miles from the nearest station. The site is totally

isolated from amenities or facilities, retail, education, healthcare and community facilities typically expected for a residential development of this scale.

It is not accessible by safe walking or cycling routes (there are no cycle routes or footways serving the site) and the current bus service does not meet frequency requirements for a new development of 1250 residents. The applicant's own documentation emphasises the need to provide extensive on-site services to reduce the need to travel, which itself indicates the site's poor relationship with surrounding services.

I would like to object on the grounds that the development is not in a sustainable location. Given the scale of occupation proposed, and that the development does not provide genuine transport choice it therefore, does not satisfy policies in the NPPF, OCC Local Transport and Connectivity Plan and Cherwell District Council Local Plan seeking to prioritise development in sustainable locations supported by sustainable travel.

2. Inadequate Public Transport Accessibility

The Transport Assessment and Travel Plan acknowledge reliance on existing transport arrangements and contain no evidence of a significant enhancement to public transport provision capable of serving a resident population equivalent to a small village.

The existing bus service Route 25 operates on a timetable of every 1.5 hours until 2pm then does not start again until 4pm. It is currently designed to serve prison staff and visitors shift patterns and visiting hours.

The CIHT suggests that a bus service for new residential developments should ideally be every 12 minutes. Campaign to Protect Rural England (CPRE) recommend a guaranteed minimum hourly service (12 hours a day, from 6 am to midnight, 7 days a week) for rural villages with populations exceeding 200–300 people.

The current bus service does not meet these standards as there is no village at this location. Therefore, the proposal should be supported by enhancement to the existing public bus service to bring it in line with Oxfordshire County Council's bus service standards.

The nearest bus stop is located some 400m away outside the prison. This is in line with acceptable distances to a bus stop in rural areas. However, there is no safe access to this bus stop. There is no safe crossing point on the B4011 for new residents to reach the bus stop. The B4011 is a fast busy road (the Government's own assessments show vehicles are regularly in excess of the speed limit) and the current route to the bus stop from the site is via a sub-standard overgrown footway – which is really more of a verge.

Oxfordshire County Council's (OCC) Enhanced Partnership Plan and Scheme 2022 key policy is Keeping buses at the heart of decision-making with a priority to 'invest in public transport" which is supported by OCC's Local Transport & Connectivity Plan mode hierarchy,

prioritising bus to ensure that positive decisions are made to promote and support bus travel and improve integration with other modes.

Therefore, I would like to object as the there is insufficient public transport provision to accommodate a development of this size. There are no safe proposals in this application to meet minimum accessibility requirements.

3. Limited Assessment of Wider Transport Effects

The Transport Assessment focuses principally on vehicular movements generated by staff, deliveries and operational activity. However, a scheme housing 1,256 residents for up to ten years will create substantial travel demand extending well beyond the site. Therefore the assessment underestimates the cumulative effects on local bus services, rail connections, walking routes and the wider transport network associated with residents' day-to-day movements.

Therefore, it is suggested that the Secretary of State gives limited weight to the transport conclusions because the assessment does not take full account of the impact of the development in transport terms as it does not fully consider the full impact of the development over the long term.

4. Impact on the Character of the Area

The proposal includes extensive modular accommodation blocks, supporting facilities, security infrastructure, roads, parking and operational infrastructure over a ten-year period. Although described as “temporary”, ten years represents a substantial planning period and therefore, it is argued that the scale, intensity and institutional character of the development would materially alter the character of this former military site and surrounding countryside setting, resulting in adverse visual and landscape effects which are not outweighed by the claimed temporary nature of the proposal.

Consequently I would like to object that the impact of the development on character, visual and landscape effects have not been properly considered as the development is considered temporary. However, 10 years is a considerable planning period and therefore, these should be fully assessed.

5. Heritage Concerns

The site lies within the wider context of the historic MOD Bicester estate, which includes heritage assets of national significance. The application is accompanied by a substantial Archaeological and Heritage Assessment, indicating the sensitivity of the site and its surroundings.

I would like to object on heritage grounds as there is insufficient evidence has been provided to demonstrate that harm to the significance, setting or appreciation of heritage assets has been avoided or minimised.

6. Ecological and Environmental Impacts

The site adjoins ecological assets including the Jubilee Nature Reserve, and the application required ecological appraisal, habitats assessment and consultation with Natural England.

I would like to object on ecological and environmental impacts as the effects on protected habitats and species resulting from the scale of occupation, increased human activity, lighting, noise and recreational pressure over ten years are not fully quantified in the submitted assessments.

7. Insufficient Community Infrastructure Assessment

The planning statement discusses healthcare, wellbeing and local service access, but the proposal would effectively create a new community of more than 1,250 people. Larger than some of the neighbouring villages and hamlets.

I would like to object as the application does not provide adequate evidence regarding capacity impacts on local NHS services, community facilities, voluntary-sector support services and public infrastructure over the ten-year operational period.

8. Overreliance on Temporary Justification

While presented as a temporary development, the operational period sought is ten years, with the Transport Assessment indicating facilities are being designed so they could operate for longer if required.

Substantial weight in the argument for this development is that it is temporary. Yet 10 years should be assessed as a significant medium-term development in land use terms. Therefore, I believe that the impact of the development has not been fully considered as it has been incorrectly assessed as temporary.

9. Prematurity and Lack of Local Scrutiny

The proposal is being pursued through the Urgent Crown Development process, bypassing the normal local planning authority determination route. The application documents state that it is being processed through the fast-track urgent Crown procedure and that pre-application discussions were not undertaken.

While the use of the procedure itself is lawful, the absence of normal local scrutiny and the fact that the local planning authority or the highway authority have not been engaged with limits confidence that all local impacts have been appropriately tested and mitigated.

Detailed Highways and Transport Grounds for Objection

1. The Transport Assessment appears to underestimate travel demand

The assessment largely focuses on staff, service vehicles and operational traffic movements rather than properly assessing the transport consequences of accommodating up to 1,256 residents for a ten-year period. The application proposes a development population comparable to a small village, yet the transport analysis appears to be based on the assumption that the site will be largely self-contained and residents will only travel outside of the site on shuttles.

Objection:

The Transport Assessment underestimates likely trip generation arising from a resident population of up to 1,256 people and does not adequately assess demand on the wider transport network, particularly public transport services, active travel routes and movements between the site and Bicester town centre.

2. Unsustainable location

The site is located 5.2 miles outside the main urban area of Bicester and is accessed from the busy fast moving B4011. The applicant acknowledges the need to provide extensive on-site facilities specifically to reduce the need for residents to travel.

It fails to recognise that most daily destinations are off-site; access to services would be is dependent upon walking relatively long distances, cycling or poor public transport provision and there is no proposals to improve these and that the proposal is not located in an area that would normally be considered highly accessible sustainable location for a residential development of this scale

Objection - the development fails to occupy a location that is demonstrably accessible by a range of sustainable transport modes and consequently conflicts with the sustainable transport objectives of the NPPF and Oxfordshire's Local Transport and Connectivity Plan.

3. Road Safety

The road safety assessment is inadequate.

The road safety assessment concludes that the development will not contribute to any road safety issues.

However the B4011 has a notoriously poor road safety record and as well known by both Buckinghamshire and Oxfordshire Councils. It is popular with motorcyclists due to its wide curves and has proportionately high motorcyclist accidents. The exert from publicly available

version of crash map below shows the large number of accidents along the route including three near the site and a fatal involving a motorcyclist and a car in 2025 near Blackthorn.

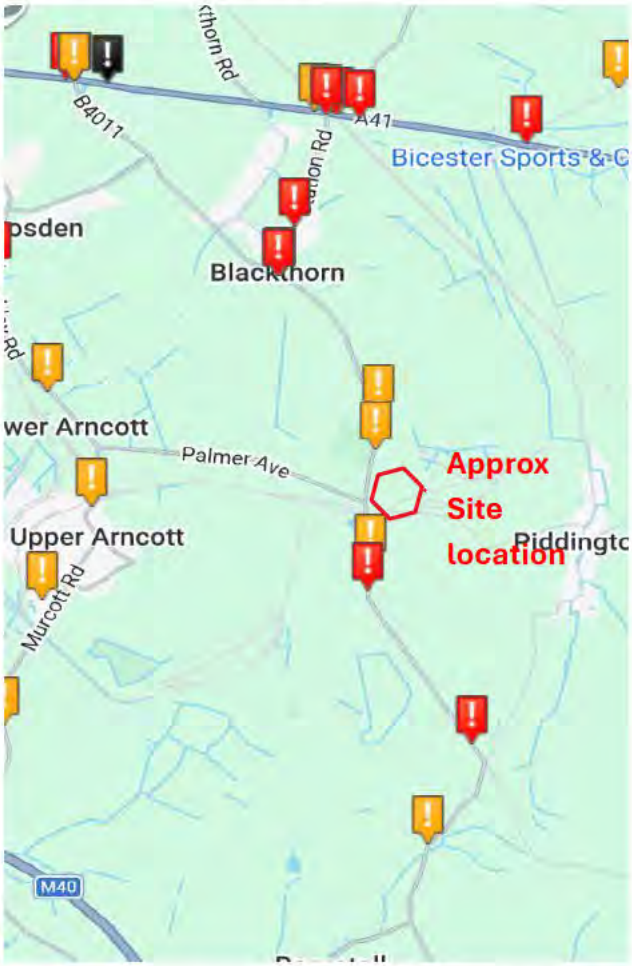


Figure showing location of accidents on the B4011 – Source: Crash Map

The site access is an off set junction from Palmer Ave next to Widnell Lane off the B4011. There will be four accesses within 400m of a 50MPH stretch of the B4011 with no additional mitigation. Widnell Lane is concealed from the main B4011 and has poor visibility exiting it. The intensification of use of the proposed access to the site is likely to significantly contribute to road safety challenges of the B4011. Off set roads always have considerable road safety challenges. This combined with now having four access along this stretch with the intensification of use of Site A access would greatly increase the likelihood of an accidents at this location.

The transport assessment does not adequately address the potential traffic generation of the site as it does not consider the movement of the residents and therefore, the road safety impact of the intensification of the access has not been properly assessed.



Figure showing four junctions on the B4011 within 400m on a 50mph stretch of road.

4. Poor Public Transport Connectivity

The Transport Assessment and Travel Plan acknowledge reliance on existing transport arrangements and contain no evidence of a significant enhancement to public transport provision capable of serving a resident population equivalent to a small village.

The existing bus service Route 25 operates on a timetable of every 1.5 hours until 2pm then does not start again until 4pm. It is currently designed to serve prison staff and visitors shift patterns and visiting hours.

The CIHT suggests that a bus service for new residential developments should ideally be every 12 minutes. Campaign to Protect Rural England (CPRE) recommend a guaranteed minimum hourly service (12 hours a day, from 6 am to midnight, 7 days a week) for rural villages with populations exceeding 200–300 people.

The current bus service does not meet these standards as there is no village at this location. Therefore, the proposal should be supported by enhancement to the existing public bus service to bring it in line with Oxfordshire County Council's bus service standards.

The nearest bus stop is located some 400m away outside the prison. This is in line with acceptable distances to a bus stop in rural areas. However, there is no safe access to this bus stop. There is no safe crossing point on the B4011 for new residents to reach the bus stop. The B4011 is a fast busy road (the Government's own assessments show vehicles are regularly in excess of the speed limit) and the current route to the bus stop from the site is via a sub-standard overgrown footway – which is really more of a verge.

Oxfordshire County Council's (OCC) Enhanced Partnership Plan and Scheme 2022 key policy is Keeping buses at the heart of decision-making with a priority to 'invest in public transport" which is supported by OCC's Local Transport & Connectivity Plan mode hierarchy, prioritising bus to ensure that positive decisions are made to promote and support bus travel and improve integration with other modes.

Further there is no assessment that the existing bus service can accommodate additional daily demand. The documentation does not appear to include engagement with operators or modelling of passenger impacts.

A strong transport objection could therefore state:

Therefore, I would like to object as the there is insufficient evidence to demonstrate that there is sufficient safe and accessible public transport provision to accommodate a development of this size. There are no safe proposals in this application to ensure the site meets minimum accessibility requirements.

5. Travel Plan does not cover all users of the site

The Travel Plan is largely framework-based and acknowledges that many future measures will be developed once occupation occurs. It also only formally applies to staff and visitors rather than the resident population itself. This is unusual given that residents will account for the overwhelming majority of trips.

I would like to object on the grounds that the Travel Plan is insufficiently developed, lacks firm mitigation commitments and excludes the principal trip-generating population, namely site residents. Consequently there is inadequate certainty that sustainable travel objectives can be achieved.

6. No active travel infrastructure provision

The application relies upon walking and cycling opportunities, yet there is no additional provision to accommodate these. The highspeed B4011 and connections towards Bicester have no walking or cycling facilities. There is no safe crossing point on the B4011 and the location of the site entrance close to two existing roads with conflicting turning movements means that it is difficult and unsafe place to cross.

There is one section of substandard footway opposite the site that provides access to the prison road and bus stop. There is no footway on Palmer Avenue or B4011. If residents would like to walk to Bicester, as the bus service is so infrequent, they will be walking in the live carriageway of a 50MPH road.

There are no substantial improvements to active travel infrastructure beyond the site boundary. Yet the applicant seems to assume that existing walking and cycling infrastructure is sufficient for potentially hundreds of daily movements by residents.

7. No meaningful engagement

The Transport Assessment explicitly states:

"no pre-application scoping discussions have been held with the local planning and highway authorities" because of the urgent process. This is considered unacceptable for a proposal accommodating more than 1,200 residents.

The absence of pre-application engagement with any authorities especially the local highway authority has prevented appropriate agreement on assessment scope, methodology, mitigation and transport modelling assumptions, resulting in a lack of confidence in the conclusions presented and there is concern that local impacts would have been missed.

7. Limited assessment

The assessment focuses largely on the site access junction and concludes it operates within capacity. However, the application does not include all users of the site as it does not include the over 1200 residents of the site. In addition the planning issue is not simply whether vehicles can enter and leave the site.

The assessment does not sufficiently examine:

- impacts on local bus services;
- pedestrian infrastructure;
- cycle routes;
- town centre transport facilities;
- railway station access;
- road safety impact that is based on all users of the site;
- mitigation measures;
- infrastructure to facilitate sustainable transport – such as walking cycling and support for more frequent bus services;
- cumulative impacts alongside planned growth within Bicester and the wider Cherwell District Council area.

The proposal effectively introduces a large residential population into a location that is not planned for strategic residential growth and where supporting transport infrastructure has not been developed through the normal Local Plan and transport-planning process.

The proposal represents a significant population concentration in a location not identified through the development plan process and is unsupported by corresponding investment in sustainable transport infrastructure and without full assessment of it's impacts.

Conclusion

The Transport Assessment fails to robustly assess the transport consequences arising from the long-term accommodation of up to 1,256 residents and instead focuses predominantly on operational vehicle movements. Insufficient evidence has been provided regarding likely demand for public transport, active travel infrastructure, local services and wider movement patterns. Consequently the applicant has not demonstrated that the site is a sustainable location for development of this scale or that necessary transport mitigation has been identified and secured.

There is a strong presumption that the development is temporary but 10 years is considered a significant planning period and therefore more robust assessment to determine the full impact of the proposed development should be undertaken before any decision is made.

Thank you for considering my comments.

Yours faithfully

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