[redacted]

From: [redacted]
Sent: 15 September 2026 21:00
To: Crown Casework
Cc: Calum Miller MP; wpwsobjection@gmail.com
Subject: Objection to MOD Bicester Site A – PCU/RARE/C3105/3378843

[redacted]

Dear Crown Casework Team,

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

I am writing as a resident of the Bicester area to object to the Home Office's application to accommodate up to 1,256 people at MOD Bicester Site A for ten years. Please place this representation before the Secretary of State.

I understand the difficulty of reducing reliance on asylum hotels while providing people with suitable accommodation. There is no easy answer. My concern is that this proposal moves one problem elsewhere while leaving fundamental questions about this site unanswered. It risks creating lasting difficulties both for those accommodated there and for neighbouring areas, without demonstrating that the development proposed can operate acceptably at full capacity.

The most serious gap is foul-water disposal. The applicant's Drainage Design Statement says key information about the existing treatment works, permits and drainage network is missing and that the viability of its current proposals has not been determined. It considers tankering during the initial phase, subject to a receiving works having capacity, but expressly says this is not viable at full occupation. Connection to the public sewer is preferred, although the required network and treatment capacity have not been confirmed. The alternative is a new on-site treatment works and watercourse outfall requiring a full design and environmental permit.

These options have different consequences for delivery, vehicle movements and the receiving environment. Reserving land for a treatment plant does not establish that it can be built and operated acceptably. Before permission is granted for 1,256 occupants, the Secretary of State should have evidence of a feasible disposal route, receiving capacity, necessary consents and a delivery programme for each phase. A condition can secure the details of a demonstrated solution; it cannot establish whether one exists.

There is also a material conflict between the proposed surface-water design and the assumptions used in the EIA screening decision. The Drainage Design Statement says part of Phase 1 has no suitable area for attenuation, so its flows cannot be restricted to greenfield rates. It proposes an approximately 440 m^2 concrete drop-off area whose runoff is likewise not planned to meet those rates. Yet the EIA screening written statement records assurances that discharge will achieve greenfield rates and that the development introduces no additional hardstanding. These assurances form part of its reasoning on likely environmental effects.

The difference matters particularly because Natural England's July advice on Arncott Bridge Meadows SSSI stated that it had not seen the drainage details and relied on an emailed account anticipating greenfield runoff rates. I recognise that the screening statement records later, more reassuring Natural England advice. Nevertheless, Natural England and the Lead Local Flood Authority should assess the drainage design

actually proposed, and the Secretary of State should establish whether the screening conclusion remains sound on that basis. The development assessed must be the development permitted.

The flood-risk baseline also needs reconciliation. The Flood Risk Assessment says no flooding has been recorded at the site, whereas the Drainage Design Statement records the MOD site team's account of frequent surface-water flooding affecting much of the southern entrance and parts of the area it calls Zone 1. It reports blocked drains and poor maintenance. The site team attributed flooding partly to two failed pumps, but the report says their existence and specifications could not be verified during the visit. The northern entrance would become the main operational access; the southern entrance is proposed for construction and emergencies. Each entrance therefore needs to be assessed according to its intended use.

These differing accounts do not prove that the accommodation will flood. They do mean that the Secretary of State lacks a reconciled account of the risks to the proposed layout and access. The applicant's own reports call for further investigation of drainage condition, flood flow paths and final levels. A phase-by-phase assessment should demonstrate that accommodation, essential plant and access remain safe, including when drains are blocked or any necessary pumps fail. Oxfordshire County Council, as Lead Local Flood Authority, should assess that evidence before determination.

The Transport Assessment raises a further site-suitability question. It records no footway at the proposed main entrance, narrow footways near the southern entrance, no formal crossing facilities and inadequate pedestrian infrastructure for reaching nearby destinations. It recommends using Home Office minibuses. The Bicester Bike Users Group's submitted objection also disputes whether the surrounding routes offer practical cycling access. Those route-specific concerns should be tested by the highway authority.

Residents would be free to come and go. Providing facilities on site and promising a minibus service does not remove the need to show how journeys beyond its boundary can be made safely and reliably. The application should identify usable routes, any deliverable off-site improvements and the minibus capacity and service that would be secured throughout occupation.

Finally, a resident's ecological objection identifies a possible gap in the baseline: the applicant's Preliminary Ecological Appraisal lists the Buckinghamshire and Milton Keynes Environmental Records Centre and the NBN Atlas as sources, while the resident reports obtaining relevant protected-species records from the Thames Valley Environmental Records Centre. Those additional records should be verified and addressed by the applicant's ecologist. Nearby records do not prove species occupy the development footprint, but they may affect what surveys and mitigation are needed.

I ask the Secretary of State to refuse permission on the evidence currently available. If the applicant supplies material new evidence before determination, I ask that the full-capacity foul-water solution, drainage and screening discrepancy, flood safety and external access first be resolved, with the relevant specialist bodies consulted. Any materially revised proposal should be published so residents can comment on what is actually proposed. Urgency explains the wish to decide quickly; it does not establish that this site is suitable.

Yours sincerely,

