[redacted]

From: [redacted]
Sent: 16 September 2026 13:11
To: Crown Casework
Subject: Comment on your application reference PCU/RARE/C3105/3378843 PORTFUTURES UK CORRIDOR OBSERVATORY REPRESENTATIONS ON URGENT CROWN DEVELOPMENT APPLICATION

[redacted]

Dear Sir or Madam,

Please find below representations from the Portfutures UK Corridor Observatory concerning the proposed development at MOD Bicester Site A.

We recognise entirely the pressures facing the Crown and accept that there may be a genuine national requirement to secure suitable asylum accommodation quickly. Our representations are not directed at asylum policy or at the people requiring accommodation. They address whether the physical development, supporting infrastructure and local consequences have been adequately evidenced.

There is, however, a wider question of fairness and consistency.

Commercial infrastructure developers face equally pressing national problems: freight congestion, constrained ports, inadequate rail capacity, energy requirements, housing delivery and failing supply-chain resilience. Yet projects capable of addressing those problems can spend years—and sometimes decades—passing through planning, consultation and approval processes. They must establish transport capacity, drainage, utility connections, environmental mitigation and commercial deliverability before being permitted to proceed.

The Crown has created an accelerated route for its own urgent requirements. That may be understandable, but it must not become a **two-tier planning system** in which public urgency permits unresolved matters to be deferred while commercial applicants remain subject to the full weight and duration of due process.

The principle should be simple: the timetable may be accelerated, but the evidential standard should not be reduced.

Our review identifies several matters which remain unquantified or dependent upon future confirmation—notably shuttle-bus demand, foul-water capacity, wastewater tankering, drainage sequencing, healthcare provision and the controls governing a nominally temporary use that may continue beyond ten years.

We offer these observations constructively. Portfutures has spent more than four decades working with transport, logistics and strategic-development projects globally. Through the UK Corridor Observatory, we are testing a method of examining major decisions against independently verifiable evidence rather than institutional assurance alone.

We appreciate the very compressed timetable under which officials are working and would be pleased to clarify any part of our analysis. We would also welcome correction where the published record contains information we may have interpreted incorrectly.

Good planning should accommodate urgency. It should not allow urgency to replace proof.

Kind regards,

[redacted]

[redacted]

[redacted] MOD Bicester Site A
MHCLG reference: PCU/RARE/C3105/3378843
Cherwell District Council reference: 26/01833/CROWN
Applicant: Home Office
Proposal: Accommodation for up to 1,256 non-detained asylum seekers
Representation submitted by: [redacted]
Date: 17 September 2026

1. Introduction

Portfutures International Corridors Ltd submits these representations through the Portfutures UK Corridor Observatory.

Portfutures is a British infrastructure and corridor-development company. Its team has more than 40 years' experience examining the relationship between strategic development, transport capacity, utilities, land use and local, national and regional economies.

The UK Corridor Observatory is being established to provide independently verifiable analysis of important infrastructure and planning decisions. Its purpose is not to advocate for or against any political position, but to test whether the evidence before a decision-maker is sufficiently complete, consistent and reliable to support the decision being requested.

These representations are therefore confined to material planning considerations. They express no view on national asylum policy or on the individuals who may be accommodated at the site.

2. Executive conclusion

The application seeks permission for a substantial new residential institution comprising:

- up to 1,256 non-detained adult male residents;
- approximately 130 staff;
- 600 modular accommodation units;
- 147 car-parking spaces;
- healthcare, catering, welfare and recreational facilities;
- new drainage, wastewater, energy and security infrastructure; and
- an intended operational life of at least ten years, with provision for operation beyond that period.

The disclosed evidence contains significant unresolved dependencies. These concern:

1. the completeness of the transport assessment;
2. the absence of quantified shuttle-bus movements;
3. the sustainability and accessibility of the rural location;
4. foul-water capacity and reliance upon tankering;
5. surface-water management and the sequencing of drainage infrastructure;
6. the effects on protected ecological receptors;
7. the practical meaning of a "temporary" ten-year permission designed to operate for longer;
8. healthcare and public-service capacity;
9. contamination, asbestos and unexploded-ordnance risk;
10. monitoring, enforcement and responsibility for mitigation; and
11. the compressed opportunity for local scrutiny under the Urgent Crown procedure.

These are not peripheral details. They concern whether the development can operate safely and sustainably without exporting material costs, risks or capacity requirements to surrounding communities and infrastructure.

Portfutures respectfully submits that planning permission should not be granted until these dependencies have been resolved through verified evidence.

If the Secretary of State is nevertheless minded to grant permission, occupation should be prevented until binding plans covering transport, foul water, drainage, ecology, healthcare, emergency services, community liaison and eventual decommissioning have been approved.

3. The Urgent Crown procedure does not displace planning merits

The Government's policy requires Urgent Crown development to be both nationally important and genuinely required as a matter of urgency. It also confirms that Crown applications remain subject to determination on their planning merits, with due consideration given to national and local planning policy.

Urgency may justify an accelerated process. It does not convert an unresolved infrastructure dependency into an acceptable planning impact.

The abbreviated procedure makes it more—not less—important that the Secretary of State distinguishes between:

- matters established by evidence;
- matters inferred from comparable sites;
- matters promised for subsequent design stages;
- matters dependent upon third-party agreement; and
- matters that have not yet been quantified.

A rapid decision should not create a position in which the principle and scale of development have been approved before the infrastructure required to support that development has been demonstrated to be deliverable.

4. Scale, duration and reversibility

The description of the proposal as "temporary" requires careful qualification.

The application documents indicate that:

- the initial operational period would be ten years;
- the facilities are being designed to operate for longer;
- continuation beyond ten years may be permitted following review;
- no definitive decommissioning programme has been provided; and
- the EIA screening material assumes permanent operation as a worst-case scenario.

A ten-year institutional use accommodating 1,256 people is capable of producing enduring infrastructure, environmental and community effects. "Temporary" should not be treated as meaning short-lived, readily reversible or inherently low-impact.

Any permission should therefore include:

- an absolute cessation date;
- no extension without a fresh planning application;
- a fully costed decommissioning and restoration plan;
- an enforceable timetable for removing modular buildings and infrastructure;
- an independently secured restoration bond or equivalent financial mechanism; and
- baseline surveys against which restoration can be verified.

A review after ten years is not equivalent to an enforceable requirement to cease the use.

5. Transport evidence is materially incomplete

5.1 Known operational movements

The applicant's own written statement identifies approximately:

- 260 staff vehicle movements per day;
- 192 service-vehicle movements per day;
- two minibus movements associated with arrivals; and
- up to 30 taxi movements per day.

That produces approximately 484 disclosed daily vehicle movements before any shuttle-bus movements are added.

The number, routing, timing and capacity of shuttle buses have not been quantified, notwithstanding that the proposal relies upon those services to provide access to off-site facilities and reduce local effects.

The total operational transport demand has therefore not been established.

5.2 No pre-application highway scoping

The Transport Assessment records that, because of the expedited process, no pre-application scoping discussions were held with the local planning or highway authorities before it was prepared.

This is important. For a development of this scale, local highway knowledge should inform:

- assessment junctions;
- traffic-distribution assumptions;
- construction routes;
- pedestrian and cycling conditions;
- cumulative development scenarios;
- seasonal and abnormal traffic conditions;
- emergency access; and
- monitoring requirements.

The lack of prior scoping increases the need for independent scrutiny by Oxfordshire County Council before determination.

5.3 Rural accessibility

The Transport Assessment acknowledges that:

- the site is in a rural location;
- no significant facilities are available within a two-kilometre walk;
- the site is poorly placed for ordinary public-transport access; and
- residents will depend substantially upon facilities provided on-site or organised transport.

Residents will nevertheless be non-detained and free to leave on foot. The real pedestrian desire lines, destinations and frequency of trips therefore need to be assessed rather than assumed away through the description of the site as "self-sufficient".

The application should demonstrate safe routes between the site and Piddington, Arncott, Ambrosden, Bicester and relevant public-transport stops. Particular attention should be given to road speeds, lighting, footway continuity, crossing points and conflict with heavy vehicles.

5.4 Inconsistency requiring clarification

The application documents appear to refer variously to the principal access road as the B4011 and the B1104. The correct road designation, survey locations and modelled access points should be confirmed before reliance is placed on the transport conclusions.

5.5 Required transport information

Before determination, the applicant should provide:

- a complete multimodal trip budget;
- the assumed number and timetable of shuttle buses;
- proposed shuttle destinations and routes;
- confirmation of whether wastewater tankers are included in service-vehicle totals;
- construction traffic volumes and routing;
- cumulative assessment with committed local development;
- pedestrian and cycling safety audits;
- emergency-access testing;
- an assessment verified by Oxfordshire County Council; and
- enforceable thresholds triggering additional transport mitigation.

The application should not be approved on the assumption that unspecified future operational management will remedy an incomplete transport case.

6. Foul-water disposal remains unresolved

The application acknowledges that it has not yet been confirmed whether the existing sewer network has sufficient capacity to receive foul water from the development.

Interim tankering is proposed, potentially involving transfer to Bicester Wastewater Treatment Works. However, acceptance and treatment capacity at that facility remain subject to confirmation.

This creates several unanswered questions:

- How much foul effluent will be generated each day at each phase?
- How many tanker movements will be required?
- Are those movements included in the Transport Assessment?
- What storage capacity will exist during disruption, bad weather or contractor failure?
- What happens if Bicester Wastewater Treatment Works cannot accept the material?
- Which alternative licensed facilities have been identified?
- What are the routes and hours of tanker operation?
- What spill-response arrangements will protect nearby watercourses and designated ecological sites?
- At what point will a permanent solution replace tankering?

A development accommodating 1,256 people should not be occupied before a deliverable foul-water solution and confirmed receiving capacity are secured.

Natural England’s acceptance that a properly controlled tankering operation need not damage the SSSI is not the same as proof that the complete operational system, receiving capacity and vehicle requirement have been secured.

No phase should be occupied until the Environment Agency, Thames Water and the relevant drainage authority have confirmed the final arrangements in writing.

7. Surface water and sequencing

The application identifies areas of surface-water flood risk and proposes attenuation tanks, pumping and other drainage infrastructure.

However, elements of the principal attenuation infrastructure are described as part of Phase 3. This raises a fundamental sequencing question: what drainage system will protect residents, neighbouring land and ecological receptors during Phases 1 and 2?

Permission should require all strategic drainage infrastructure needed to serve any occupied phase to be completed and operational before that phase is occupied.

The final design should demonstrate:

- safety throughout the development's full potential lifetime;
- allowance for climate change;
- no increase in flood risk elsewhere;
- safe access and escape;
- water-quality treatment;
- emergency storage during pump or power failure;
- maintenance responsibility and funding; and
- monitoring of discharge quality and quantity.

These details should not be deferred if they affect the fundamental feasibility of the proposed scale of occupation.

8. Ecology and water environment

The site lies close to sensitive ecological receptors, including Arncott Bridge Meadows SSSI and Piddington Wood ancient woodland, and within a Drinking Water Safeguard Zone.

The application relies upon mitigation, final drainage design, operational procedures and regulatory controls to exclude significant effects.

Where multiple safeguards are necessary, the Secretary of State should identify:

- the responsible party for each measure;
- when each measure must be delivered;
- the performance standard to be achieved;
- how compliance will be monitored;
- who receives monitoring results;
- the corrective action required if a threshold is exceeded; and
- whether occupation must reduce or cease following a material failure.

Mitigation should be secured through precise conditions rather than general assurances that details will be agreed later.

9. Ground conditions, asbestos and unexploded ordnance

The application site has a long history of military occupation. The published evidence refers to asbestos-containing materials, possible contamination and unexploded-ordnance risk.

Given that the proposal would introduce a large resident population, adequate intrusive investigation and remediation must precede occupation.

The Secretary of State should require:

- intrusive contamination surveys;
- asbestos surveys and removal plans;
- unexploded-ordnance risk mitigation;

- soil and groundwater testing;
- validation reports following remediation;
- controls on construction dust and contaminated runoff; and
- independent confirmation that each occupied area is suitable for residential-institutional use.

These are matters affecting the suitability of the land for its proposed users, not merely construction-management details.

10. Healthcare and public services

The applicant proposes an on-site medical centre with eight consulting rooms and states that routine and primary care requirements will principally be met on-site.

The documents nevertheless acknowledge potential demand on emergency and external healthcare services. They also refer to external GP capacity, including Unity Health at Brill.

Before permission is granted, the Secretary of State should require current written evidence from relevant healthcare bodies confirming:

- which services will be provided on-site;
- operating hours and clinical staffing;
- responsibility for commissioning and funding;
- arrangements outside operating hours;
- ambulance and emergency demand;
- mental-health provision;
- infectious-disease and isolation arrangements;
- access to dentistry, pharmacy and secondary care; and
- whether nearby practices and hospitals possess sufficient capacity.

A statement that a practice was accepting patients at a particular date is not a durable capacity agreement for a ten-year development.

Equivalent operational consultation should be demonstrated with Thames Valley Police, the fire and rescue service, ambulance service, local public-health bodies and other affected authorities.

11. Relationship with surrounding communities

Piddington is identified as approximately 250 metres from the application site. Its proximity means that it could experience effects associated with:

- pedestrian movements;
- traffic and servicing;
- lighting;
- noise;
- landscape change;
- emergency incidents;
- protest activity;
- pressure on facilities; and
- public concern resulting from inadequate information.

These matters must be handled objectively and without stigmatising future residents.

A formal community liaison structure should be established before construction begins. It should include Piddington Parish Council, other affected parishes, Cherwell District Council, Oxfordshire County Council, emergency services, the Home Office and the site operator.

It should publish verified information on:

- occupancy levels;
- transport movements;
- complaints and response times;
- environmental monitoring;
- incidents affecting neighbouring communities;
- performance against planning conditions; and
- corrective measures.

The operator has not yet been appointed. Responsibility for compliance must remain enforceable against the Crown applicant and must not depend solely upon the performance of a future contractor.

12. Alternatives and scale

The Urgent Crown process establishes an asserted need for accelerated determination. It does not remove the need to demonstrate why the proposed site and maximum scale represent an acceptable planning solution.

The evidence should explain:

- why 1,256 bedspaces are required at this particular site;
- whether a smaller first phase would meet the immediate urgent requirement;
- what alternative Crown sites were assessed;
- how environmental and infrastructure constraints were compared;
- whether the development can operate safely at each intermediate phase; and
- what objective evidence would justify progression from one phase to the next.

A phased application should be accompanied by phased decision gates. Approval of the maximum capacity should not automatically follow from evidence showing only that an initial 408-person phase may be manageable.

13. Environmental Impact Assessment

The Secretary of State has directed that the proposal is not EIA development.

Portfutures does not suggest that the direction can simply be disregarded. However, the screening material itself records several matters whose final form remains uncertain, including foul-water management, aspects of drainage, operational transport and duration.

The planning decision should therefore explain clearly how cumulative effects have been assessed where important operational inputs remain unconfirmed.

If the scheme, infrastructure solution, phasing, capacity or operational assumptions change materially after permission, the need for further environmental screening should be reconsidered before those changes are authorised.

14. Requested decision

Portfutures respectfully requests that the Secretary of State either:

A. Withhold or defer permission

Permission should be withheld or determination deferred until the applicant has supplied, and relevant technical bodies have reviewed:

1. a complete transport and shuttle-bus assessment;
2. a verified foul-water strategy with confirmed receiving capacity;
3. a fully sequenced surface-water drainage scheme;
4. final ecological mitigation and monitoring;

5. intrusive contamination, asbestos and UXO investigations;
6. secured healthcare and emergency-service arrangements;
7. a phase-by-phase infrastructure-capacity assessment;
8. a community liaison and transparency protocol; and
9. an enforceable decommissioning and restoration plan.

B. Alternatively, impose strict controls

If permission is granted, it should include conditions providing that:

- no phase may be occupied until its transport, wastewater, drainage, healthcare, ecological and emergency-service requirements are operational;
- maximum occupancy is controlled separately for each phase;
- progression between phases requires written approval based on monitored performance;
- wastewater tankering cannot commence without confirmed receiving capacity and an approved routing and spill-response plan;
- strategic drainage must precede occupation;
- shuttle buses must operate to an approved service specification;
- residents must be provided with safe and dignified access to necessary off-site services;
- transport and environmental performance must be independently monitored and published;
- complaints and incidents must be reported through a transparent liaison process;
- the use must cease on a fixed date unless fresh permission is granted;
- all structures and infrastructure must then be removed and the site restored; and
- responsibility for compliance remains with the applicant irrespective of any operating contractor.

15. Final observation

The central planning question is not whether the national requirement is important. It is whether this particular development, at this scale, in this location, can be shown to operate safely and sustainably for its full potential lifetime.

At present, several of the systems upon which that conclusion depends remain unquantified, unconfirmed or deferred to later design and operational stages.

The Urgent Crown route permits speed. It does not require the Secretary of State to substitute assumption for evidence.

Portfutures therefore asks that the application be determined only upon independently verifiable evidence and that no community, public authority or environmental receptor be left carrying an infrastructure risk that the application has not fully identified, funded and controlled.

Submitted by:

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Preserving economies with independently verifiable truth