[redacted]

From: [redacted]
Sent: 16 September 2026 08:33
To: Crown Casework
Cc: calum.miller.mp@parliament.uk; wpwsobjection@gmail.com
Subject: Objection to planning application PCU/RARE/C3105/3378843, Site A, MOD Bicester

[redacted]

[redacted]

Dear Secretary of State

Re: PCU/RARE/C3105/3378843 – Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

I write as a member of the public to object to the planning application PCU/RARE/C3105/3378843, the proposed development of Site A at MOD Bicester for accommodation of up to 1,256 person asylum accommodation centre at the above address.

I respectfully request that planning permission be refused.

My objection is based upon material planning considerations including the apparent incompleteness of the evidence presently before the decision-maker; unresolved electricity and wastewater infrastructure; climate change and carbon emissions; potential generator emissions and noise; contamination and asbestos; flood risk and drainage; highways and pedestrian safety; community safety and safeguarding; fire safety; and the sustainability and suitability of this isolated location for development of this exceptional scale.

I am particularly concerned that a number of matters fundamental to establishing whether the development is safe, sustainable and deliverable appear to remain subject to future investigation, detailed design, feasibility studies or pre-commencement conditions.

1. Electricity supply and proposed generators

The applicant's own Utilities and Infrastructure Assessment identifies an estimated maximum electrical demand of approximately 2.16 MVA.

More importantly, it states that the condition, capacity and configuration of the existing electrical network are currently unknown and that the capacity of the primary intake, distribution points, transformers and substations has not yet been verified.

The Assessment consequently assumes that the existing electrical infrastructure cannot be relied upon and states that temporary and/or permanent generator provision will be incorporated to support the development.

This is not an insignificant detail for a development intended to accommodate up to 1,256 people for as long as ten years.

Before determining the application, I ask the Secretary of State to require clear answers to the following:

• How many generators would be required and what would their individual and combined generating capacity be?

• What fuel would they use?

• Would they provide emergency backup power only, transitional power pending a grid connection, or form part of the permanent electricity supply?

• If described as temporary, what is the maximum period for which they could operate?

• What are their anticipated operating hours and fuel consumption?

• What are the anticipated annual greenhouse-gas emissions?

• What are the anticipated NOx, particulate and other air-pollutant emissions?

• What noise would be generated, particularly during night-time operation?

• What fuel-storage arrangements would be required and what environmental and fire-safety implications arise from those arrangements?

• What environmental permits, if any, would be required?

• What permanent electricity solution has been agreed, with whom, and by what enforceable date would it be delivered?

These matters should, in my view, be established before permission is granted rather than left unresolved after the principle of development has been approved.

2. Apparent inconsistency with climate-change and sustainability objectives

There appears to be a significant tension between reliance upon generators and the sustainability case advanced for this proposal.

The applicant's Planning Proposal Statement relies upon the claimed energy efficiency of modular construction and states that the development has potential to incorporate low-carbon technologies.

However, the same application documentation leaves important matters for later determination. Feasibility assessments concerning renewable energy, including photovoltaic panels, and other energy solutions are proposed at later stages.

At the same time, the Utilities Assessment expressly contemplates temporary and/or permanent generator provision because the existing electricity infrastructure cannot presently be relied upon.

This raises a fundamental question: what is the actual operational carbon footprint of the development being approved?

The development is proposed for ten years. Generator operation cannot simply be regarded as an insignificant construction issue if generators could supply a material proportion of the electricity required during occupation.

The National Planning Policy Framework requires development to help reduce greenhouse-gas emissions, while the adopted local planning policies cited by the applicant themselves establish an energy hierarchy prioritising reduced energy use, efficient supply and renewable energy.

I therefore ask that the Secretary of State require a quantified energy and carbon assessment addressing generator use before determination, together with a clear energy strategy demonstrating how the development complies with relevant national and local climate-change policies.

It is difficult to understand how the climate-change effects can be properly weighed in the planning balance without knowing whether a 1,256-person development may be materially dependent upon generator-generated electricity, potentially for an extended period.

3. Air-quality assessment and generator emissions

I am also concerned about whether the submitted Air Quality Screening Technical Note adequately assesses this issue.

That assessment identifies road traffic as the dominant operational emission source.

However, the Utilities Assessment separately establishes that temporary and/or permanent generators may be required.

I therefore ask the Secretary of State to establish whether emissions from the proposed generator provision have actually been included within the operational air-quality assessment.

If they have not, I request that an updated assessment be required before determination addressing the type, number, generating capacity, fuel, operating hours and cumulative emissions of the proposed generators.

This is particularly important because generator emissions would occur at a fixed location within the development rather than on the wider road network, potentially close to residential accommodation, staff and other receptors.

4. Asbestos, demolition and contaminated land

The proposal includes demolition of existing buildings and structures.

The applicant's Planning Proposal Statement also acknowledges that, because of the site's previous use, made ground may contain contamination including asbestos-containing material, and proposes further targeted sampling.

This raises two separate issues which should not be conflated.

First, there is potential asbestos contamination within made ground.

Second, there is the question of whether asbestos-containing materials are present within buildings and structures proposed for demolition.

HSE requirements concerning demolition are clear that appropriate refurbishment/demolition asbestos surveys must identify asbestos-containing materials, including hidden materials, before structural work begins, and that asbestos-containing materials must, so far as reasonably practicable, be removed before major demolition.

I therefore ask the Secretary of State to establish whether comprehensive refurbishment/demolition asbestos surveys have been completed for every building and structure proposed for demolition.

If they have, I request that the relevant findings be taken into account in assessing the environmental and safety effects of demolition.

If they have not, I question whether the decision-maker presently has sufficient information concerning the demolition phase.

The potential cumulative effects of asbestos removal, demolition dust, contaminated ground, construction activities and future occupation should be properly considered.

5. Ground contamination

The applicant itself acknowledges the potential for contamination in made ground and proposes further targeted sampling.

I am concerned that intrusive ground investigation appears therefore to remain outstanding despite the proposal involving residential occupation by a substantial population.

The decision-maker should have sufficient information to establish that the land is suitable for its intended use and that contamination can be safely and practically remediated.

I ask that the necessary intrusive investigation, including appropriate investigation for asbestos-containing materials and other contaminants, be completed and considered before a decision is made.

6. Flooding, surface water and drainage

The Utilities Assessment itself records evidence of ponding and localised flooding and states that existing assets appear ineffective.

It further acknowledges that the proposed surface-water strategy is based upon assumptions arising from limited surveys and incomplete information, including absence of ground investigation, CCTV drainage surveys and full topographical coverage.

A development accommodating up to 1,256 people should not, in my view, proceed on an illustrative drainage solution where the underlying information necessary to verify that solution remains incomplete.

I request that the Secretary of State require the relevant investigations and a demonstrably deliverable drainage solution before determining the application.

7. Wastewater infrastructure

There is a similar difficulty concerning foul drainage.

The Utilities Assessment states that key information concerning wastewater-treatment capacity, foul-network condition and connectivity remains incomplete and that the suitability of connection to the municipal treatment system cannot presently be confirmed.

An on-site wastewater treatment works, new outfall and discharge permit have consequently been assumed as the most onerous design option.

Wastewater disposal for a population of up to 1,256 people is fundamental infrastructure, not a minor detailed-design matter.

I therefore ask that a confirmed, technically acceptable and environmentally permissible wastewater solution be demonstrated before permission is granted.

8. Highways and pedestrian safety

The application site is in an isolated rural location served by the B4011.

Of particular concern, the applicant's own Utilities Assessment records that there is currently no pedestrian infrastructure along this section of the B4011 and describes it as a rural single-carriageway road subject to a 60mph speed limit, with limited surrounding road capacity and no significant urban street infrastructure in the immediate vicinity.

A development accommodating 1,256 people inevitably generates pedestrian movement, irrespective of the provision of private buses.

I therefore ask that the Secretary of State be satisfied that safe pedestrian movement between the development and surrounding communities can genuinely be achieved.

The assessment should consider lighting, footway provision, crossing points, desire lines, traffic speeds, cycling, access to public transport and foreseeable pedestrian movements rather than assuming all movements will take place using organised transport.

9. Community safety, safeguarding and vulnerable members of the public

I also request proper consideration of community safety and safeguarding.

This concern should not be interpreted as an assumption that an individual presents a risk because of nationality, immigration status or background.

The relevant planning question is whether accommodating up to 1,256 adult residents in an isolated location, together with the resulting movements and interactions with surrounding communities, has been supported by sufficient objective evidence and appropriate management and physical infrastructure.

The assessment should consider the safety of both occupants and the existing public, including people who may reasonably experience particular vulnerability when walking or travelling on isolated routes, including women, children, elderly people and other vulnerable persons.

I ask that the Secretary of State give appropriate weight to the advice of Thames Valley Police and require evidence concerning site security, staffing, access control, CCTV where appropriate, lighting, incident response, safeguarding, emergency arrangements and liaison with local police and public services.

Fear unsupported by evidence should plainly not determine a planning application. Equally, legitimate safeguarding and community-safety considerations should not be dismissed merely because the proposed development concerns asylum accommodation.

They should be assessed objectively on the evidence.

10. Scale, location and sustainability

The fundamental concern running through many of these issues is the relationship between the exceptional scale of the proposal and its location.

This is a development for up to 1,256 people, potentially operating for ten years, in an isolated rural location with limited surrounding infrastructure, limited public transport and no existing pedestrian infrastructure along the adjoining section of the B4011.

The proposal then requires substantial new infrastructure to overcome the limitations inherent in that location, potentially including electricity generators, water storage, wastewater treatment, new drainage infrastructure, private transport arrangements and extensive security and management measures.

I ask the Secretary of State to consider whether this accumulation of mitigation is itself evidence that the site is not inherently suitable or sustainable for development of the scale proposed.

11. The extent of unresolved information

I am concerned by the number of matters which the applicant's own documents indicate remain unresolved or require further work.

These include verification of electricity-network capacity; the extent and duration of generator provision; renewable-energy feasibility; detailed ground investigation; potential contamination including asbestos-containing material; drainage surveys; wastewater capacity and connectivity; and other detailed infrastructure matters.

Planning conditions have an important legitimate function, but they should not be used to defer matters where the missing information is necessary to determine whether the development is acceptable in principle.

For a development of this scale and proposed duration, I respectfully submit that the Secretary of State should be satisfied about the fundamental feasibility, safety and environmental effects of the development before granting permission.

12. Inadequate opportunity for public scrutiny

Finally, I remain deeply concerned about the exceptionally short representation period.

I recognise that this application is proceeding under the Urgent Crown Development procedure and therefore do not suggest that the ordinary consultation rules automatically apply.

Nevertheless, the application comprises a very substantial body of technical material spanning utilities, contamination, ecology, drainage, flooding, transport, air quality, noise, fire safety, security and other matters.

The Government's own application page states that representations will be taken into account insofar as they raise material planning considerations.

A meaningful opportunity to make such representations requires a reasonable opportunity to examine the underlying evidence.

I therefore request an extension of the representation period to permit proper public, local-authority and technical scrutiny.

Conclusion

Taken cumulatively, I do not believe the evidence presently demonstrates that Site A is a suitable, safe and sustainable location for a development accommodating up to 1,256 people for a period of up to ten years.

The unresolved matters are not peripheral. They concern the means by which the site will be powered, how wastewater will be treated, how surface water will be managed, whether contaminated land can safely be occupied, how asbestos and demolition will be managed, how pedestrians can safely access an isolated site, and the environmental and carbon consequences of operating the development.

I therefore respectfully request that planning permission be refused.

If the Secretary of State is nevertheless minded to grant permission, I request that no decision be made until the outstanding evidence necessary to assess these matters has been completed and properly considered, including:

• confirmation of a deliverable electricity supply and full details of any temporary or permanent generator provision;

• a quantified energy, carbon and generator-emissions assessment;

• assessment of generator noise, air-quality and fuel-storage implications;

• refurbishment/demolition asbestos surveys for buildings and structures to be demolished, where required;

• intrusive ground investigation and contamination assessment;

• a verified surface-water drainage solution;

• a confirmed foul-water/wastewater solution and necessary regulatory approvals;

• appropriate highways and pedestrian-safety evidence;

• completed ecological and arboricultural work where material;

• adequate fire-safety, safeguarding, security and emergency arrangements; and

• a clear and enforceable decommissioning and site-restoration strategy.

Where any of those matters can lawfully and appropriately be addressed by condition, I ask that conditions contain objective and enforceable requirements and prevent occupation until infrastructure and safety measures necessary for occupation have actually been delivered.

Given the exceptional scale of the development, its proposed ten-year duration and the number of unresolved matters identified within the applicant's own evidence, I respectfully ask the Secretary of State to apply appropriate precaution and scrutiny before reaching any decision.

Please treat this correspondence as my formal representation in respect of planning application PCU/RARE/C3105/3378843 and take it into account in full when determining the application.

Yours faithfully

