From: [redacted]
To: Crown Casework
Cc: calum.miller.mp@parliament.uk; wpwsobjection@gmail.com; [redacted]
Subject: Objection to planning application PCU/RARE/C3105/3378843, Site A, MOD Bicester
Date: 16 September 2026 15:51:16

[redacted]

Dear Secretary of State,

I am writing on behalf of my husband and I, as members of the public, to object to planning application PCU/RARE/C3105/3378843, the proposed 10-year temporary use of Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE, for non-detained asylum accommodation for up to 1,256 service users.

We are residents of [redacted], one of the villages in the vicinity of the proposed development.

We ask that planning permission be refused.

We have significant concerns about the completeness and reliability of the evidence submitted with the application. In our view, the application does not yet provide a sufficiently robust evidence base to demonstrate that a development of this scale can be accommodated safely and sustainably at this location.

Errors and Inconsistencies in the Transport Assessment

The Transport Assessment identifies the B4011 as the road forming the western boundary of the site and as the road from which the site is accessed. However, elsewhere it repeatedly refers to the B1104, including using B1104 traffic-flow and speed data in its assessment of the site. The Transport Assessment records traffic flows at the site access points as being on the B1104, despite elsewhere correctly identifying the B4011 as the road serving the site. It also refers to the MOD Bicester Garrison sports pitches as being on the B1104.

This is not simply a minor typographical error if incorrect road data has been used in the assessment of highway conditions, traffic flows and speed. We ask that the applicant be required to clarify the error and demonstrate that all traffic, highway and junction assessments have been undertaken using the correct roads and correct baseline data.

Incomplete Ecological Evidence

The Preliminary Ecological Appraisal acknowledges that the ecological assessment is not comprehensive. It states that the protected-species assessment was based on a single visit and that determining the presence or likely absence of protected species would normally require multiple visits at suitable times of year. The report also states that the optimal period for the extended UKHab survey is April to September, whereas the survey was undertaken partly in late March. The report itself acknowledges that this may reduce confidence in detecting less conspicuous or seasonally apparent flora and some species field signs.

More importantly, the ecological report recommends further targeted surveys for hazel dormouse, Barn Owl, breeding birds, great-crested newts, reptiles and terrestrial invertebrates. It also identifies trees with potential bat-roost features and recommends further bat surveys where relevant. We are therefore concerned that the Secretary of State is being asked to determine an application of this scale before the ecological evidence necessary to establish the presence or likely absence of protected species has been completed.

The application is also approximately 1.8km from Arncott Bridge Meadows SSSI. The applicant's own Planning Proposal Statement records that Natural England requested further information concerning potential hydrological impact pathways to the SSSI before the significance of those impacts and the scope for mitigation could be determined.

We ask that the outstanding ecological and hydrological work be completed and made publicly available before any decision is taken

Previous Planning History

This site has previously been considered for asylum accommodation. In 2003, a proposal for approximately 750 asylum seekers was considered following a public inquiry. The independent Planning Inspector recommended that planning permission should not be granted, but the Secretary of State subsequently overruled that recommendation and granted planning permission. The proposal was never implemented and was ultimately abandoned.

The current proposal is substantially larger, providing for up to 1,256 service users. The previous Inspector's findings are therefore plainly relevant evidence when considering the suitability of this location, particularly in relation to its rural and isolated character, accessibility and the availability of services.

We ask the Secretary of State to give proper consideration to those previous findings and to explain what has materially changed since 2003 to justify a substantially larger proposal at the same location.

Infrastructure and Utilites

The Government has explained that former military sites are being considered as part of efforts to reduce reliance on hotel accommodation. However, Site A is a former Defence Storage and Distribution Centre rather than an operational barracks with an established infrastructure suitable for a development of this scale.

The application documents themselves identify significant uncertainty concerning the capacity and condition of existing utilities. For example, the Utilities and Infrastructure Assessment states that the condition, capacity and configuration of the existing electricity network are not currently known and that the existing electrical infrastructure cannot presently be relied upon. It therefore assumes that temporary and/or permanent generator provision will be required.

The same assessment identifies incomplete information concerning foul-water infrastructure and states that further surveys are required to establish drainage connectivity, capacity, condition and other matters. It also records evidence of ponding and localised flooding.

The applicant's Planning Proposal Statement accepts that further investigation of the existing foul and surface-water systems is required and proposes to secure important longer-term infrastructure requirements through pre-commencement conditions.

We do not consider it appropriate for a development of this scale and intensity to be approved before the fundamental infrastructure required to operate it safely and reliably has been properly established. We also ask that the applicant provide a clear assessment of the expected generator use, fuel requirements, fuel deliveries, associated HGV movements, emissions and noise impacts, together with the proposed arrangements for wastewater treatment and disposal.

Transport, Pedestrian Safety and Rural Location

The Transport Assessment acknowledges that the site is in a rural location with limited amenities and that there is an absence of pedestrian infrastructure serving the site. It

specifically recommends that service users use minibuses provided by the Home Office to access facilities in nearby towns. The assessment also records that there are no footways at the northern site access, while the existing footway provision around the southern access is limited and there are no formal dropped kerbs or crossing facilities.

The proposal therefore relies substantially upon vehicle transport to overcome the site's poor pedestrian accessibility. This is a significant consideration for a development accommodating up to 1,256 people and operating for ten years.

We ask that the Secretary of State fully consider the additional operational traffic generated by minibuses, coaches, servicing vehicles, staff and other vehicles, as well as construction traffic, and the implications for highway safety and rural road users.

Noise, Lighting and Environmental Effects

The scale of the proposed development, together with its associated generators, plant, vehicles, lighting, security infrastructure and 24-hour operations, has the potential to introduce a substantially different noise and lighting environment into an otherwise rural area. The application should therefore demonstrate adequately how noise, artificial lighting, vehicle movements and other operational impacts will affect nearby homes, farms, rural businesses and the wider countryside.

Any assessment should address both normal operation and abnormal or peak activities, including deliveries, waste collection, construction, generator operation and emergency arrangements.

Value for Public Money

We recognise the Government's stated objective of reducing reliance on hotel accommodation and associated costs. However, the proposed development involves substantial new modular accommodation, roads, utilities, wastewater infrastructure, power generation, security infrastructure and associated works. The National Audit Office has previously found significant cost and delivery problems with the Government's earlier large-site asylum accommodation programme, including an expectation that the programme would cost more overall than the hotel accommodation it was intended to replace.

We are not suggesting that this establishes the cost of the present proposal. Rather, given the substantial infrastructure requirements at Site A, we are concerned that the application does not demonstrate through a site-specific whole-life cost assessment that this particular proposal represents value for money for taxpayers. We ask that the Secretary of State consider whether sufficient evidence has been provided to justify the substantial expenditure associated with establishing and operating this site for ten years.

Insufficient Time for Proper Scrutiny

We are concerned that the representation period is exceptionally short for an application of this scale and complexity. The application was published on 2 September 2026 and the representation period runs from 7 September to 17 September 2026. The application comprises a large suite of technical documents covering ecology, transport, utilities, fire safety, flooding, drainage, contamination, heritage, landscape, noise, air quality and other matters. The Government's own application page lists these documents, including a 103-page Transport Assessment, 86-page Preliminary Ecological Appraisal, 75-page Utilities and Infrastructure Assessment, 100-page Drainage Design Statement and 164-page preliminary geo-environmental and geotechnical assessment.

The standard Crown Development procedure provides for a minimum 21-day representation period. Although this application is proceeding under the separate Urgent Crown Development procedure, which does not itself prescribe a 21-day public representation period, the exceptionally short period allowed here materially limits the

opportunity for residents, parish councils, local authorities and technical specialists to examine the evidence and respond.

We therefore respectfully ask that the representation period be extended to provide at least 21 days from 7 September 2026, namely until Monday 28 September 2026.

Conclusion

Taken together, these matters leave us concerned that the applicant has not yet demonstrated that Site A is a suitable location for a development of this scale and duration. In particular, we ask the Secretary of State to consider the outstanding ecological surveys, the unresolved hydrological issues identified by Natural England, the uncertainty surrounding utilities and drainage, the highway and pedestrian-accessibility issues, the apparent errors in the Transport Assessment, the previous planning history, and the substantial infrastructure and operational requirements of the proposed development.

We therefore respectfully request that planning permission be refused.

If the Secretary of State is nevertheless minded to approve the application, we ask that no decision be made until the outstanding work concerning drainage, flooding, wastewater, contamination, ecology, hydrology, highways, pedestrian safety, power supply, generator operation, lighting, noise, fire safety and decommissioning has been completed and made available for proper public and technical scrutiny.

Yours faithfully,

