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Representation on the Proposed Asylum Accommodation Centre at MOD Bicester Site A

Application Reference: PCU/RARE/C3105/3378843

I am submitting this representation as a Buckinghamshire councillor representing Buckingham Ward and as the Liberal Democrat parliamentary candidate for Mid Buckinghamshire.

My comments relate to the planning merits of the application, the adequacy of the supporting evidence and the extent to which the likely impacts of the proposal have been assessed, not to the need of providing adequate housing for asylum seekers in itself.

I am setting out my observations under the following headings:

- Cross-border impacts and consultation;
- Transport and accessibility;
- Healthcare and public services;
- Flood risk and drainage;
- Environmental and ecological impacts;
- The proposed ten-year duration; and
- Matters deferred to later assessments and conditions.

Cross-border impacts and consultation

My main concern as a Buckinghamshire councillor is that the application appears to focus primarily on the effects on nearby Oxfordshire communities, particularly Piddington and Upper Arncott.

However, the site sits immediately adjacent to the Buckinghamshire boundary and several Buckinghamshire villages have already been identified by local representatives and parish councils as communities that may be affected by the proposal, including Brill, Oakley, Ludgershall, Boarstall, Marsh Gibbon and Long Crendon.

Administrative boundaries do not necessarily reflect how residents access healthcare, transport infrastructure and other public services. A development within Oxfordshire may still have material effects on neighbouring communities within Buckinghamshire.

I would therefore ask whether sufficient consideration has been given to:

- impacts on Buckinghamshire communities;
- transport movements extending into Buckinghamshire;
- possible effects on healthcare and public services used by Buckinghamshire residents; and
- how representations from Buckinghamshire councils and residents will be taken into account.

I am concerned that Buckinghamshire communities do not appear to feature in the application to the same extent as nearby Oxfordshire settlements. Given the scale of development proposed and the ten-year period for which permission is sought, I believe there should be greater confidence that cross-border effects have been assessed appropriately.

Transport and accessibility

The application acknowledges that the site occupies a relatively isolated rural location with limited pedestrian, cycle and public transport infrastructure. The proposal relies heavily on the site operating as a self-contained facility supported by managed transport arrangements.

This raises questions as to whether sufficient evidence has been provided regarding:

- the long-term operation of shuttle bus and transport arrangements;
- the implications if demand for off-site travel proves greater than anticipated;
- impacts on surrounding rural roads;
- and the lack of safe pedestrian and cycle connections to nearby settlements and services.

The self-contained nature of the proposal forms an important part of the applicant's case. This means that the practical operation of the transport arrangements becomes a key consideration when assessing the overall suitability of the site.

While the application assumes that day-to-day needs will largely be met within the site, I am not convinced that the evidence currently available fully demonstrates how these assumptions will operate over a ten-year period.

Healthcare and public services

The application proposes that healthcare and welfare provision will largely be available on site and states that the development will function in a way that minimises reliance on local services.

I am concerned that the evidence currently available does not provide sufficient detail regarding the relationship between on-site provision and existing healthcare services.

The application identifies the GP practice at Brill as the nearest surgery to the site. This raises a legitimate cross-border planning question regarding the potential implications for healthcare provision serving Buckinghamshire communities.

I would therefore ask whether sufficient evidence has been provided regarding:

- the range of healthcare services that will be available on site;
- arrangements for services that cannot be provided on site;
- the anticipated use of local NHS services;
- contingency arrangements should demand exceed expectations; and
- the longer-term implications for healthcare provision in surrounding rural communities.

Similar questions arise regarding utilities, emergency services and other public infrastructure.

The application assumes that the site will be largely self-contained. I would like to see greater detailed evidence to support this assumption, rather than operational aspiration.

Flood risk and drainage

The application identifies areas of surface-water flood risk within the site and acknowledges that further work is required in relation to drainage and wastewater infrastructure.

I recognise that planning conditions can be used to secure detailed drainage arrangements. However, for a development intended to accommodate up to 1,256 people, drainage and wastewater infrastructure are fundamental considerations rather than peripheral matters.

This raises questions regarding:

- the adequacy of wastewater treatment arrangements;
- longer-term surface-water management;
- the relationship between development areas and identified flood-risk areas;
- and whether sufficient evidence exists at this stage to demonstrate that these matters can be resolved satisfactorily.

I am not convinced that all of these issues have yet been addressed in sufficient detail.

Environmental and ecological impacts

The submitted documents identify the need for further survey work relating to a number of protected species and habitats, including bats, dormice, breeding birds, reptiles and amphibians. The application also acknowledges the site's proximity to environmentally sensitive areas.

My concern is not the existence of further surveys in itself, as that is relatively common within major development proposals.

Rather, I would ask whether sufficient information is currently available to provide confidence that the environmental impacts of the proposal are fully understood.

In particular, I believe further reassurance is needed regarding:

- protected species impacts;
- mitigation measures;
- the implications for nearby designated sites;
- and the extent to which environmental effects remain dependent on future assessment work.

For a development of this scale and duration, I would expect the evidence base to provide a high degree of confidence regarding likely ecological effects before a final decision is taken.

The proposed ten-year duration

The application describes the proposed use as temporary but seeks permission for a period of ten years.

Ten years is a substantial period in planning terms. It is long enough for impacts on transport, infrastructure, public services and surrounding communities to become established and potentially significant.

I would therefore ask:

- why a ten-year period is considered necessary;
- whether alternative durations were considered;
- how the site's operation would be reviewed during this period; and
- what arrangements would be put in place should impacts differ materially from those currently anticipated.

The development should, in my view, be assessed on the basis of a long term proposal, rather than a temporary one.

Matters deferred to later assessments and conditions

A recurring theme throughout the application is the number of matters that remain subject to future assessment, survey work, management plans or planning conditions.

These include, among other matters:

- drainage infrastructure;
- ecological surveys and mitigation;
- contamination investigations;
- detailed operational arrangements;
- utilities and infrastructure provision;
- energy assessments; and
- elements of the final site design.

Taken individually, these may appear reasonable matters to address through conditions. Taken together, however, they raise a broader question regarding whether the evidence base is sufficiently complete at the present time.

For a development of this size and and given the numerous implications outlined above, I believe that more of these assessments need to be completed before a decision should be made.

Conclusion

My concern is not with the principle that suitable accommodation needs to be provided.

However, I question whether the evidence currently available demonstrates that this particular site is suitable for development on the scale and duration proposed.

In my view, important questions remain unresolved and need to be addressed before determination of the application. These relate to:

- cross-border impacts on Buckinghamshire communities;
- transport and accessibility;
- healthcare and public service provision;
- flood risk and drainage;
- environmental impacts;
- the implications of a ten-year consent; and
- the extent to which significant matters remain dependent upon future assessments and conditions.

I am particularly concerned that the implications for neighbouring Buckinghamshire communities have not been explored in the same level of detail as those for nearby Oxfordshire settlements.

I would therefore ask that these matters are given careful consideration and that the decision-maker is satisfied that they have been fully addressed before any final decision is reached on the application.