FORMAL OBJECTION: Urgent Crown Development Application – MOD Bicester (Site A)

Ref: PCU/RARE/C3105/3378843
Site: Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE
Applicant: Home Office

Dear Sir/Madam,

I am writing as a Cherwell District Councillor to register my formal objection to the above application for the temporary, ten-year use of the former MOD Bicester defence storage and distribution site for non-detained asylum accommodation for up to 1,256 people, together with associated modular accommodation, demolition, roads, parking, staff facilities, security infrastructure, open space, utilities and wastewater treatment.

I fully recognise that the Government faces significant pressures in providing appropriate accommodation for people seeking asylum. My objection is not directed towards the people who may be accommodated at this site. It is directed towards the scale and nature of the proposal, the shortcomings in the evidence currently available, and the manner in which the application is being brought forward.

A development capable of accommodating more than 1,250 people for ten years is, in practical terms, a substantial and long-term change in the use of this site. It should therefore be subject to proper environmental assessment, meaningful consultation and rigorous consideration of its consequences for the surrounding communities.

The fact that the application is being advanced under the Urgent Crown Development procedure should not mean that the normal standards of evidence and scrutiny are relaxed.

1. The consultation period is wholly inadequate

The period allowed for representations is only from 7 September to 17 September 2026.

That is an exceptionally short period for an application of this scale and complexity. The supporting material runs to hundreds of pages and includes, amongst other documents, a 103-page Transport Assessment, a 75-page Utilities and Infrastructure Assessment, a 164-page geo-environmental assessment and an 86-page ecological appraisal.

It is simply unrealistic to expect local residents, parish councils, councillors and other interested parties to examine material of this complexity properly within ten days,.

There is an additional accessibility issue. The application documentation is stated to be available for physical inspection at Cherwell District Council's offices in Banbury and at the MHCLG office in Birmingham. Neither location provides convenient access for many of the communities most directly affected by the proposal.

An urgent planning process should accelerate decision-making where genuine urgency exists; it should not become a mechanism for limiting the ability of those affected to understand and respond to a proposal.

I therefore ask that the representation period be extended significantly and that no decision is taken until there has been a genuinely meaningful opportunity for the local community and relevant authorities to respond.

2. The environmental evidence is incomplete

I am particularly concerned about the decision that an Environmental Impact Assessment is not required.

The Secretary of State's screening direction of 26 August 2026 determined that, although the proposal falls within the Schedule 2 category of Urban Development Projects, it is not EIA development.

In my view, that conclusion should be reconsidered given the scale of the proposed development, its ten-year duration, the amount of new infrastructure proposed and the sensitivity of the surrounding environment.

The ecological evidence supplied with the application itself identifies significant limitations.

For example, the ecological appraisal:

- relies on a desk study undertaken through the Buckinghamshire and Milton Keynes Environmental Records Centre and the NBN Atlas, rather than the Thames Valley Environmental Records Centre, which is the relevant local environmental records centre for Cherwell and Oxfordshire;
- is based on one single site visit;
- expressly states that it cannot be regarded as a comprehensive assessment of the ecological interest of the site;
- undertook habitat survey work in late March, outside the optimum April–September survey period; and
- identifies the need for further surveys relating to hazel dormouse, barn owl, breeding birds, great crested newt, reptiles and terrestrial invertebrates, together with pre-construction checks for badger and water vole.

The issue is therefore not simply whether mitigation can eventually be provided. The fundamental question is whether we currently have sufficient information to understand the environmental consequences of granting permission.

There are also particular concerns regarding bats and great crested newts. The available information identifies relevant species records in the area, while the site itself contains habitats and features that could support protected species.

The site is also approximately 1.8km from Arncott Bridge Meadows SSSI and lies within its impact zone. The documentation identifies hydrological and pollution pathways requiring further consideration and consultation with Natural England.

It is difficult to see how the environmental consequences of this development can be properly assessed while important ecological surveys and other investigations remain outstanding.

It would be preferable for the necessary evidence to be obtained before a decision is taken, rather than granting permission and attempting to resolve fundamental ecological questions subsequently through planning conditions.

I therefore ask the Secretary of State to reconsider the EIA screening decision and to require a full Environmental Statement before determining the application.

3. Infrastructure and public services must be properly assessed

The proposed population increase is substantial.

Up to 1,256 people would be accommodated on the site for a period of ten years. This cannot reasonably be regarded as having no significant implications for the surrounding area.

Bicester and the neighbouring communities have already experienced considerable development and associated demands on infrastructure and services. The implications of this proposal therefore need to be considered alongside existing and committed growth.

Among the matters requiring proper assessment are:

- GP, dental and other primary healthcare provision;
- mental health and other specialist services;
- education and school places, including the implications of any children accompanying residents;
- public transport provision;
- traffic and road capacity;
- parking and vehicle movements;
- policing, emergency services and community safety;
- water supply and foul drainage;
- the capacity and operation of the proposed wastewater treatment arrangements; and
- flood risk and surface-water management.

It is particularly important that the financial consequences for local services are not simply passed to already-stretched local authority budgets.

I have not seen evidence that the relevant local authorities, parish councils, NHS bodies and other public services have been given adequate time to test the assumptions contained in the applicant's assessments and establish what additional capacity or financial contributions would be required.

The fact that technical assessments have been submitted by the applicant does not in itself establish that their conclusions have been independently tested.

Before any decision is made, there should be clear agreement with Cherwell District Council and Oxfordshire County Council about infrastructure requirements, mitigation and funding.

4. Drainage and the impact on the SSSI require further scrutiny

I have particular concerns about the interaction between the proposed development, surface-water management, foul drainage and the nearby Arncott Bridge Meadows SSSI.

The material supplied indicates that the proposed drainage arrangements do not simply reproduce existing greenfield conditions. Phase 1, for example, involves new impermeable surfacing and the documentation indicates that greenfield runoff restrictions cannot be fully achieved.

There are also concerns about foul drainage arrangements. The applicant's documentation indicates that tankering is not viable at full occupancy.

This raises an obvious question: what happens if the proposed permanent wastewater solution is not operational before occupation reaches the intended level?

This should not be treated as an administrative detail. Failure of drainage or wastewater arrangements could have direct consequences for the local environment, water quality and the nearby designated site.

I therefore believe that the drainage strategy, wastewater arrangements and potential impacts on the SSSI should be fully resolved before occupation is permitted.

5. The location and connectivity of the site need proper consideration

The proposal describes the accommodation as self-contained, but the site's relationship with surrounding settlements also needs to be examined from the perspective of the people who will live there.

There is no pedestrian route from the site to Piddington or Upper Arncott and, from the information available, no firm commitment to a shuttle service.

If people are expected to live at the site for potentially ten years, there needs to be a realistic assessment of how they will access shops, healthcare, public transport and other services.

The absence of safe and practical alternatives to private or organised transport could create additional pressure on local roads while also contributing to isolation.

If the site is to be used as accommodation for such a large population for such a prolonged period, active travel and public transport provision should form part of the planning solution rather than being left to assumption.

6. Local democratic accountability matters

I am also concerned about the implications of the procedure being used.

I understand that the Government has powers to use the Urgent Crown Development process where there is a compelling national need. However, the existence of that power should not mean that local democratic involvement becomes little more than an exercise in receiving representations after the important decisions have already effectively been made.

The proposal was announced some months ago, yet the detailed documentation has only now been made available for public consideration, followed by an exceptionally short representation period.

That is particularly problematic when the information required to assess the application is technically complex and when important elements of the environmental evidence remain incomplete.

Local people are entitled to expect that a proposal which could materially affect their community for a decade will be properly explained, scrutinised and debated.

The urgency of the national accommodation problem should not be confused with an urgency to determine this particular application before the evidence is complete.

7. Ten years is not meaningfully temporary

Finally, I question the description of a ten-year period as a temporary use in any meaningful sense from the perspective of the communities concerned.

Ten years represents a substantial proportion of a person's life and is long enough for significant effects on local infrastructure, services, traffic, the environment and community relationships to become established.

The Government therefore needs to demonstrate not only why this site is required, but also how the proposed use will be managed throughout the entire period, what safeguards will apply, and what will happen when the ten-year period ends.

There should be no assumption that a supposedly temporary arrangement will simply become an established long-term use by default.

Conclusion

For the reasons above, I formally object to the application as presently submitted and processed.

In particular, I ask the Secretary of State to:

1. **Extend the consultation period** so that local residents, parish councils and public authorities have a realistic opportunity to examine and respond to the proposal.
2. **Reconsider the EIA screening decision**, given the scale of the development and the acknowledged gaps in the ecological evidence.
3. **Require completion of the outstanding ecological surveys before determination**, rather than relying on future conditions to resolve fundamental questions concerning protected species and habitats.
4. **Require proper assessment of the cumulative impact on local infrastructure and public services**, including healthcare, education, transport, drainage and emergency services.
5. **Ensure that appropriate mitigation and funding arrangements are agreed with the relevant local authorities before occupation**, rather than leaving the financial consequences to local taxpayers and existing services.
6. **Resolve the drainage, wastewater and SSSI concerns before permission is granted or occupation takes place.**
7. **Ensure that the communities affected have a meaningful opportunity to participate in the decision-making process**, notwithstanding the use of the Urgent Crown Development procedure.

These concerns are not objections to the principle of providing safe accommodation for people seeking asylum. They are concerns about whether this particular proposal has been sufficiently assessed and whether the process being followed provides the level of environmental protection, local accountability and democratic scrutiny that a development of this scale warrants.

I respectfully ask the Secretary of State to take these matters fully into account before determining the application.

Yours faithfully,

Councillor Fiona Mawson
Cherwell District Councillor – Kidlington East