From: [redacted]
To: Crown Casework
Cc: "wpwsobjection@gmail.com"; "Calum Miller MP"
Subject: Objection to planning application PCU/RARE/C3105/3378843, Site A, MOD Bicester
Date: 17 September 2026 23:17:16

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Dear Secretary of State,

As a member of the public and a local farmer I am writing to object to planning application PCU/RARE/C3105/3378843, the proposed 1,256-person asylum accommodation centre at Site A, MOD Bicester, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE.

I exhort that planning permission be refused.

The application documents contradict themselves in numerous places, and I have concerns about the inaccuracies and completeness of the evidence submitted with the application. For example:

MOD Bicester Drainage Design Natural England - Discretionary Advice Service Letter from Natural England Letter states:

"I note that hydrological connection between the site and the SSSI cannot be ruled out and have advised that the project will need to demonstrate that it will not alter the existing hydrological regime and therefore risk impacting the interest features of the downstream SSSI.

I also note that it is anticipated that foul water will be connected to mains and should this not be the case Natural England would also need to be consulted on the alternative means."

However, in other documents state that there is a high degree of uncertainty about the possibly of connecting to the mains and describes plans for the use of a cess pit and even an onsite wastewater treatment plant.

Ecology

Important ecological and technical work remains outstanding. The Preliminary Ecological Appraisal (PEA, ref MOD015, 13 May 2026) states its desk study data search was obtained from "the Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC) and the National Biodiversity Network (NBN) Atlas" (Section 2.2, page 4).

The site sits in Cherwell District, Oxfordshire (PEA Section 1.2, page 3). Oxfordshire's own local environmental records centre is TVERC, the Thames Valley Environmental Records Centre, not BMERC, whose remit is Buckinghamshire and Milton Keynes.

On that basis, the PEA states "No historic ecological surveys relevant to the site have been identified" (Section 2.1, page 4).

When assessing the relevant data there are plenty of sensitive receptors in the immediate surroundings and within 2km of the site. There is evidence of Great Crested Newts, Bats, Butterflies, Birds, Badgers. There are sensitive habitats and Local Wildlife Sites in the area. None of this has been taken into consideration.

Nature Space Partnerships describe "Bicester Garrison is an unusual place, home to several military units, including Headquarters of Bicester Garrison, 1 Regiment Royal Logistic Corps and the Defence Explosive Ordinance Disposal, Munitions and Search Training Regiment. Due to the absence of intensive agriculture and low footfall by people, nature flourishes unhindered and the site boasts an exceptional mosaic of habitats and matching diversity of plants and animals." Site-A is not an exception and hosts the same habitats and species that can be found in the locality.

The Preliminary Ecological Appraisal's own Limitations section then warns: "Any absence of desk study records cannot be relied upon to infer absence of a species/habitat as the absence of records may be a result of under-recording within the given search area".

Contamination

I am particularly concerned that ground contamination has not been fully investigated. Previous land-quality work identified potential contamination issues, yet no borehole investigation has been carried out to resolve those risks. Entect Ltds' 2010 Phase 1 Desk highlights the possibility of radioactive contamination within the old burning ground next to A33 (part of this burning ground is included within the application area).

Radioactive material was stored on trains sometime in the early 1980s at C-site and the rail sidings in Arncott. (This was when there was uncertainty with what to do with waste from Sellafield, it was loaded onto trains and parked up). I think that I am correct in saying that everyone who worked near them died of cancer. As A-Site has always been used as storage facility, and was connected by the rail network can the MOD prove that radioactive material was not stored onsite? A-Site covers quite an area and the only moral thing to do would be to check the site extensively.

The large storage sheds that are situated on A-Site historically warranted fire engines to be based onsite incase of a fire. **Foam throwers** were based at A-Site. Where were practice operations carried out? Given the fallout from what has been unearthed at Heyford, I think this also brings the suitability of the site into question until further investigations have been carried out.

Where is a copy of the asbestos register for the site? The Entec Report said that this was underway and was due to be completed in June 2010. The report also highlights that historical MOD practices may have led to contamination issues. "Potential activities that may have led to contamination include:

- Unrecorded disposal of waste materials in the ground. The MOD historically tended to opt for local waste disposal practices.
- Demolition of former buildings which may have contained Asbestos Containing Materials (AMCs) and subsequent retention of some demolition rubble as fill or

founding aggregate."

The report goes on to say that approximately 12 Air Raid Shelters have been demolished on a-Site and are likely to have been backfilled with an unknown or contaminated nature.

Flooding and Flood Risk

There are also significant flooding and drainage concerns. Parts of the site are at high risk of surface-water flooding and aspects of the drainage strategy remain unresolved.

The land is low lying and there is no data for onsite groundwater levels. The Flood Risk Assessment refers to data from BGS Boreholes to the south and southeast of the site (as shown in figure 2.4 of the flood risk assessment). These indicate that groundwater was struck at levels ranging from 2.5 to 5.5m BGL. As you travel south of the site the topography changes and the ground level rises. Given the difference in Gound Level elevation ABS from these BGS points it is staggering that no investigations have been carried out onsite to determine actual ground water levels. SP61NW_ is located at approximately 74m ABL, SP61NW7 is located approximately 76m ASL. Given that the southernmost boundary of Site-A is 68m ASL and that most of the application area stands at around 66m ASL this might suggest that the actual groundwater level is not as deep below the site as the two boreholes mentioned in the report.

The Preliminary Geo Environmental and Geo Technical Assessment also refer to BGS borehole groundwater data. These boreholes were investigated in 1983 (43 years ago). This data cannot be relied upon to inform decisions made on Site-A today.

The air quality technical screening note states that the development will have an underground car park. This is not mentioned in the flood risk assessment at all.

There is no mention of an onsite wastewater treatment plant in the flood risk assessment, but it is being considered as stated in other documents. This poses a hydrological risk to the River Ray, Water Meadows downstream, and the SSI at Arncott.

Highway Safety and Traffic Issues

There will be increased traffic. This development is set in a rural location away from a possible workforce, and away from towns which can provide the services that future site users will need access to. This is preventable traffic, if the site was closer to a workforce a conurbation that could provide the services that the future site user needs.

To access a path from the site you need to cross the B4011, which is a busy road with a high casualty rate. This is a short section of path that leads to Bullingdon Prison. There are no paths for pedestrians or cyclists that connect A-Site with local villages. The footpath from Arncott to the A41 past Ambrosen is in a very poor state and is a hazard to users. There is no street lighting along the roads surrounding the site. This creates a safety hazard to site users walking from A-Site and to any vehicle approaching the site on local roads or on the B4011. It is naive to suggest that the site is self-contained because there will be facilities provided onsite. Wants and needs are very separate

aspects of human nature. It is very possible that despite everything provided onsite the site users want to leave and explore. It is very possible that up to 1256 men will be walking along unsuitable roads in the dark causing risk to themselves and to other road users. (In the winter it is dark by late afternoon. Site users may well find themselves in total darkness trying to get back).

The northern entrance along the B4011 is situated near a curve in the road and has poor visibility for oncoming traffic. Using this entrance may lead to an increase in accidents.

The number of vehicle movements needed to and from site and the length of these journeys are exacerbated by the rural location. There are questions as to what utilities will be available onsite so lorries transporting potable water, tankers removing contents from the cess pit, and lorries carrying diesel to the site to power generators are highly likely. All these journeys are a result of the unsuitability of site, and the unsuitability of the sites location.

> "The purpose of the planning system, as identified in the NPPF, 'is to contribute to the achievement of sustainable development,' with three 'objectives'' identified as supporting this, which are:"
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> "1. Economic – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure."

The government might consider this the right type of land but it is not in the right place. Its rural location will make accessing the site by means of other modes of transport difficult, especially as the infrastructure is not there.

> "2. Social – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being"

This development is disproportionate to the surrounding villages which themselves cannot provide the services that Service Users of this site need and will be transported to towns for. The limited parks and open spaces that are enjoyed by locals may well be overrun by the significant influx in the population and negatively impact the current and future needs for the communities health, social and cultural well-being.

> "3. Environmental – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating, and adapting to climate change, including moving to a low carbon economy."

Transporting diesel and potable water to the site, removing wastewater from the site, staff, charity and service provider vehicle movements, and transporting Site Users to and from the site daily, is not using natural resources prudently, minimising waste and pollution, mitigating and adapting to climate change, including moving to a low carbon

economy in anyway.

Noise Disturbance and Light Pollution

Noise and disturbance that will be generated form this development will be significant. At present there is little activity on the site. Even when the site is being used for storage purposes this does not generate noticeable noise. Housing 1256 men onsite is a significant change of use and will generate noise. Disturbances and noise have been reported as an issue at similar sites that are currently operational. If generators are running to provide electricity, this will also generate noise. This will impact nearby homes as well as harming wildlife in the surrounding area. Surrounding wildlife sites supports a range of priority species and are sensitive to disturbance and lighting.

Inadequate or Unsustainable Utility Infrastructure

It is unsustainable to consider a development of this magnitude with such high demands for water and electricity without any indication of whether these connections are possible, whether there is capacity in the current system or when they could feasibly be connected. The same stands for the lack of knowledge surrounding the issue of the wastewater produced onsite. A cess pit for a site of this size is not sensible or sustainable, and neither is an onsite wastewater treatment plant. Without knowing these parameters the suitability and sustainability of the site cannot be determined. If these basic utilities cannot be connected to the site it brings its' suitability into total dispute. The project should not be allowed to get off the ground without such fundamental services being established.

Cumulative impact not assessed — Graven Hill data centre

Site A's Screening Direction (26 August 2026) only assessed cumulative effects within a 2km radius. That is not a legal requirement — the EIA Regulations 2017 (Schedule 3) require assessment of cumulation with approved development, with no fixed distance limit.

On 6 August 2026, three weeks earlier, Cherwell District Council approved a large data centre at Graven Hill, Bicester (ref 25/03310/REM): eight units on approximately 32 hectares, with substantial electricity and water demand. It falls outside the 2km radius and is not mentioned in the Screening Direction.

Both developments require significant power, water and standby diesel generation. Their combined effect on the electricity network, water supply, wastewater capacity and local air quality has not been assessed.

I ask the Secretary of State to confirm whether the Graven Hill approval was considered, and to require a proper cumulative assessment using a search area appropriate to each effect before this application is determined.

Fire Risk

It has not been assessed what the risks are if mains water cannot be connected to at this site in relation to the ability to fight fires. A lack of hydrants or sufficient water supply is a health and safety risk.

Planning Policy Conflicts

The application documents state:

"On 18 August 2003, the Office of the Deputy Prime Minister (now called the Secretary of State) granted planning permission for the demolition of existing buildings and the erection of a Home Office 'Immigration Accommodation Centre'."

This was permission was granted by Peter Mandleson despite the application being turned down by the local authority and the against the advice of an independent planning inspector following an inquiry who recommended that the application be refused. The original plan produced sought to house 1400 residents onsite. A judicial review deemed the site unsuitable and restricted the number of residents on site to be capped at 750. Building heights were also capped at 10m in height. If it is not possible to house 1256 people onsite why is the Home Office wasting taxpayers' money pursing a site that they already know is not suitable for the proposal?

Large sections of detail have been redacted in the supporting planning documents. Not being able to understand documents fully or scrutinise them impedes any planning process. Locals with knowledge of the area cannot comment or correct inaccuracies or challenge plans at an early stage and prevent possible foreseeable obstacles and issues if the information is not transparent.

I am concerned that the extremely short representation period does not provide sufficient time for residents, councils and technical specialists to properly examine such a substantial and complicated application. The application documents run to well over 1,000 pages across multiple technical disciplines, and it is not reasonable to expect them to be read and properly considered in such a short time. In doing so the Home Office are rushing through poor decisions based on limited and inaccurate data.

The Home Office applying for an Urgent Crown Development for a 10-Year **Temporary Use**. However, the Summary of proposals section in the Statement of National Importance states:

"Over time however, it is intended that the site will subsequently be expanded for use as a long-term asylum accommodation solution."

If it is a site for long term asylum accommodation that is being sought, the site should be suitable for its purpose. As demonstrated above this site is not. Proper due diligence has not been completed, and the feasibility of the site is yet to be determined.

The planning issues presented above are numerous and extensive, this plan will have catastrophic consequences. I implore you to uphold democracy and determine this planning application based on the facts highlighted above, acknowledge that there are inaccuracies, omissions, and data that has been overlooked. There is a strong case that

this site is unsuitable for the proposed development when all the above points are taken into consideration. Do not let the political policy to simply close asylum hotels impede or distort judgement in this application regarding planning matters, and the suitability of this site. I respectfully ask that planning permission be refused.

If the Secretary of State is nevertheless minded to approve the application, I ask that no decision is made until outstanding work concerning drainage, flooding, wastewater, contamination, ecology, highways, pedestrian safety, power supply, lighting, noise, fire safety and decommissioning has been completed and made available for proper scrutiny. In addition, this application is seeking permission for a temporary use. If permission is granted it should be contingent to restrictions on the title documents to ensure this permission is temporary.

Yours faithfully,

