[redacted]

From: [redacted]
Sent: 17 September 2026 23:43
To: Crown Casework
Subject: PCU/RARE/C3105/3378843 - Crown Development application: MOD Bicester (Site A)

Categories: [redacted]

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I wish to make representations on the above application as follows:

Urgency: The issues associated with using hotels for asylum accommodation have been established and understood for some time. The need for alternative asylum accommodation would have been identified by the government sufficiently long ago that this application could have been made through the normal channels, allowing for due process and proper consultation, rather than badging the application as 'urgent' and allowing it to circumvent normal planning process.

Redaction: I understand that some elements have been deemed 'sensitive' and have been redacted. It is unclear how photographs of habitats such as trees and ditches can be considered sensitive (and if military features were visible in the background, those could have been redacted without removing the ecological details). Redaction of ecological images serves only to obfuscate detail that might otherwise have allowed the documents to be independently reviewed.

Preliminary Ecological Appraisal (PEA). The CIEEM Guidelines for Preliminary Ecological Appraisal set out that a PEA *"is the term used to describe a rapid assessment of the ecological features present, or potentially present. … it is not appropriate to submit a PEAR[eport] in support of a planning application because the scope of a PEAR is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species."* The PEA report also notes that access was only partial, with the potential result that protected species have been missed. Numerous further surveys have been recommended, but no evidence of these surveys has been published; and it is unclear whether those surveys will be undertaken before a decision is made. Instead, an Ecological Impact Assessment (EcIA) should have been prepared to accompany the application, in line with CIEEM Guidelines on EcIA, as would have been a minimum requirement for any other development of this scale. That EcIA document should be prepared independently and made available for public scrutiny as part of the application process.

Environmental Impact Assessment (EIA). A statement has been issued claiming that the Proposed Development is not considered to be an EIA Development for the purposes of regulation 5(3) of the EIA Regulations. However, given the scant information available, third parties are unable to verify whether this judgement is reliable in any way, or whether EIA is warranted and an Environmental Statement should be prepared.

Consultation with the Statutory Nature Conservation Body (SNCB). Natural England was consulted in May 2026 with such scant information that NE's initial response was necessarily: *"the development is located 1.8 km from Arncott Bridge Meadows SSSI … Please re-consult Natural England once [further] information has been obtained"*. Natural England has continued to seek information that would allow it to advise further. However, the most recent correspondence sent on behalf of the applicant to NE said: *"Based on the information available to us it is not possible to*

confirm whether the surface water run-off from the site is Hydrologically linked. However, there is a strong likelihood it does given what we know about the levels and the River Ray's flow direction, and therefore it is reasonable to assume that the site's Surface water could enter the SSSI." This lack of information and superficial approach to impact assessment would be considered wholly unacceptable if proffered as part of any conventional planning application.

In summary, using the guise of 'urgency' to avoid a proper consultation process is deceptive, and the complete disregard for due process is utterly reprehensible.

[redacted]