From: [redacted]
To: Crowncasework@communities.gov.uk
Cc: planning@cherwell-dc.gov.uk
Subject: Urgent Crown Development application: MOD Bicester (Site A): Ref PCU/RARE/C3105/3378843
Date: 17 September 2026 22:55:15

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Dear Sir or Madam,

I am writing to respond to the proposal for the conversion of the former defence storage & distribution centre site (MOD Bicester A - site) to become asylum accommodation. I am a consulting engineer registered with the Chartered Institute of Building Services Engineers and I am familiar with the processes associated with Planning applications, having participated in the generation of the reports and research required for Planning Applications.

Having reviewed the documentation available, numerous points are immediately apparent:

1. The required appraisals and reports are grossly inadequate and do not meet the required standard to allow the Planning authority to determine this Planning Permission. Such an inadequate and poorly considered application should properly be rejected by the Planning Authority until such time as the appropriate detail can be satisfactorily provided.
2. The level of appraisal that has been undertaken is not adequate to demonstrate good value for money can be demonstrated to the taxpayer. The level of financial risk that this exposes the taxpayer to is unjustifiable.
3. The description of this as both "Urgent" and "of National Importance" do not stand up to scrutiny. More time should be allocated to review the suitability of the site, any suggestion that this is urgent and of National importance would appear to be party political motivated statements that cannot be justified.
4. The location of the site is demonstrably unsuitable for the integration of genuine asylum seekers as it does not enable them to integrate and learn British culture or to establish their place in British society. There is no facility provided to enable genuine asylum seekers to integrate, so this appears predicated on the supposition that the claims made are false.
5. The quantity of redaction is not appropriate. The documentation provided includes redactions that prevent interested parties accessing information that can be gained by any member of the public with sufficient time allowed, but not within the time period provided by the consultation. There is no justifiable reason for redacting the existing site utility information except to obfuscate.

My professional role as a CIBSE chartered engineer requires that I develop appraisals and reports that demonstrate how a given project can be connected to the basic utilities such as electricity, water, the sewerage network and telecommunications systems. My

professional role would require me to demonstrate how a project managed the risk of flooding. My professional role would require me to demonstrate how a site could safely manage the risk of fire. I see no evidence in the documentation provided in support of this application that would support this.

I am copying this email to the local planning department. I cannot see how this submission provides an adequate amount of detail or confidence to allow the Cherwell Planning department to validate the application, even less to approve it.

The provision of Electricity

The report indicates that there will be 1256 occupants with kitchen, laundry, and welfare facilities. As a change of use or new-build modular developments it appears likely that this development will be generally heated electrically or via heat pumps to comply with Part L of the building Regulations and the existing Nissen huts will be demolished.

The impact assessment suggests a demand of 2.16 MVA. This necessarily requires an HV grid connection and a minimum of three 800 kVA substations.

It appears highly likely that there is insufficient electricity in the vicinity of the site on the 11 kV network for this facility. A substantial upgrade of local HV electricity network will be required. No information has been made available to permit this decision to be made, nor for it to be costed. The cost associated with this must be obtained so that the economic viability of the scheme can be developed, in the interests of ensuring value for the taxpayer. Further, no assessment has been made as to the availability of power at all in the site despite very significant expansion of nearby towns such as Bicester in recent years. The infrastructure assessment makes clear reference to the fact that the existing network may be uneconomic or unsuitable.

The report notes that the capacity of the primary intake has not been verified, nor the location of existing distribution points, transformers or substations. This information is easily available to the developer from SSEN within days of applying, yet this has not been done. There is an unjustifiable statement that no diversion, modification, or connection to the existing SSE infrastructure is anticipated. This is extremely unlikely. No information has been made available to allow the local Planning Authority or SSEN to assess the degree to which this development can be supported, nor what the impact on the local electricity network for other developments would be.

The report suggests that "temporary solutions" would be needed. The conclusion that must be gained here (supported by the infrastructure assessment) is that the development is expected to run on generators for the foreseeable future. This demonstrates the site is not viable for a development housing residential accommodation. There would be no realistic means possible that the development could be sufficiently energy efficient so as to meet Part L of the building Regulations without a very significant on-site solar farm and BESS solution. There is no reference to this in the development

2.16 MVA is the maximum demand. Assuming an average site demand of 1 MVA perhaps would require around 5,000 litres of diesel per day. This equates to several tankers of diesel per week with the associated cost, air pollution, carbon impact and noise pollution.

The presence of the adjacent powerlines is no basis for a rational decision that there is power available as there are no local bulk substations to provide the necessary step-down functions.

Street Lighting

The report notes that no alterations are proposed to be made to local street lighting as a part of the development, despite the strategy assuming travel to and from the site along a 60 mph road by pedestrians or cyclists. Consideration must be given to how safe access outside of the hours of daylight can be made possible and that occupants are not restrained. A Section 106 agreement to allow this upgrade to streetlighting would appear appropriate here, as well as to cover the segregated pedestrian walkway?

The Provision of Gas

The report notes that there is no evidence of a viable gas distribution network on the site. This points to a lack of adequate information being provided to allow this statement to be firmed up either way, The report notes that there will be no proposed gas use on site, and this adds to the understanding that heat for cooking, washing and heating must be provided through electricity, which in turn has not had adequate interrogation.

Surface Water Drainage

The report notes that there are no public surface water sewer records identified within the site. There is reported ineffective performance and poor maintenance. The provision of extensive built assets on the site will exacerbate the pre-existing flooding that the locality suffers from and an appropriate means of mitigating this has not been developed. The report notes that there is poor infiltration, indicating that soakaways will be unlikely to be effective, and runoff is largely directed to nearby channels. BGS records indicate that the superficial geology is "Normally soft to firm consolidated, compressible silty clay", supporting this view. The impact of this development on the locality has not been researched despite the proximity of the site to flood zones indicated on the EA flood map. The Infrastructure assessment clearly notes that this is "illustrative" and a viable strategy has not been conceived. There is a high likelihood that this development will increase the existing flooding in the locality and no assessment has been made of this, nor any mitigation proposed. The separate Flood Risk assessment notes specifically that it does not make detailed considerations of the existing surface water drainage network. The claim that there will be no impact can therefore not be substantiated. It is noted that a separate drainage strategy will be submitted separately. Until this is provided, the development should not be granted Planning Permission as the suggestion that there will be no impact seems unjustified.

Foul Drainage

The report notes an absence of foul water treatment. Publicly available utility records have been unjustifiable redacted so as to prevent interrogation, but the addition of effluent generated by 1256 occupants and staff toileting and washing, including catering operations, must necessarily overload a rural foul drainage network. The report notes that there has been no calculation made regarding capacity or permit compliance.

Given that there is little capacity for effluent soakaway, in the absence of a sewerage system, there seems little alternative than to tanker waste away. 110 litres of foul drainage per person multiplied by 1256 residents and staff at a ratio of 1:10 suggests an effluent volume of 152 m3 per day requiring disposal. This would be 11 large tankers per day, every day, plus an appropriate storage facility to manage these volumes. Government guidance suggests that residential properties such as this would generate 150 litres of water per day, meaning more like 15 such tankers. This is clearly an unsustainable solution. It is not recognised in the traffic analysis and represents a significant risk. Assuming that the effluent was treated on-site and discharged would place an impossible burden on local water courses and would severely impact on the local propensity for flooding.

Potable and Firefighting Water

No assessment whatsoever appears to have been made in relation to how the site will receive around 150 m3 of potable water per day. This is a major oversight. The fire risk assessment requires that there should be fire hydrants provided yet there has been no assessment as to how this firefighting water source would be provided

Telecommunication

No apparent assessment has been given to the means by which 1256 people will be able to communicate with their case workers, families or other professionals, nor how the staff will be able to operate a functioning site.

Fire Risk assessment

This report contains little substance and refers to the fact that individual fire strategies are yet to be produced. For a Planning Application this is inadequate. The report contains broken links and

Notes that the highest design risk is that there is a current lack of information. This is not a RIBA Stage 2 report despite the footer suggesting it is. Until the designers have adequate access to information on which to develop their designs it is of no meaningful consequence.

Summary

- This application is poorly thought through and does not provide sufficient information to allow the Planning Authority to approve the application in its current state. Further detail must be sought.
- Inadequate information has been provided to allow the costs to be developed in relation to the provision of essential utilities to the site. As a taxpayer I am not

confident that there is a valid business case for the use of this site

- Document redaction has been deliberately used to obstruct the ability of the public to respond appropriately in the time allocated. Further time and more appropriate redaction is required.
- The site is predicated on the assumption that asylum applicants are likely to have their case rejected and do not need access to communications, to advice, to a community or to other local facilities at times other than daylight hours.

Your sincerely,

[redacted]