From: [redacted]
To: Crown Casework
Subject: Objection to Urgent Crown Development Application Ref. PCU/RARE/C3105/3378843
Date: 17 September 2026 17:33:10

You don't often get email from [redacted]. Learn why this is important

Dear Sir/Madam,

Objection to Urgent Crown Development Application Ref. PCU/RARE/C3105/3378843

I am writing to object to the above application for the temporary change of use of the former MOD Bicester (Site A) to provide non-detained asylum accommodation for up to 1,256 service users.

I respectfully ask the Secretary of State to refuse the application in full for the following reasons.

1. The representation period is inadequate

The public representation period ran from 7 to 17 September 2026, providing only ten days in which to consider a substantial body of technical and supporting documentation. The application material includes more than twenty significant documents, several of which run to well over 100 pages. In addition, some information has been withheld or redacted as "sensitive information" under section 293B(11) of the Town and Country Planning Act 1990.

A ten-day period is not, in my view, a realistic or adequate opportunity for members of the public, parish councils or technical consultees to properly scrutinise material of this scale and complexity.

This is particularly significant given the disparity between the time available to objectors and the time available to the applicant to prepare and develop its proposals. The compressed representation period materially restricts the ability of affected parties to identify, investigate and respond to potential deficiencies in the application.

The Secretary of State should therefore exercise considerable caution before relying upon an evidence base that has not been capable of being properly tested through a reasonable period of public and technical scrutiny.

2. The description of the proposal as "temporary" requires much greater scrutiny

The application is presented as a ten-year temporary use. However, the Home

Office's own Statement of National Importance states that:

“over time… it is intended that the site will subsequently be expanded for use as a long-term asylum accommodation solution.”

This raises a fundamental concern about the true nature and intended trajectory of the proposal. While the immediate application may be described as temporary, the applicant's own documentation indicates an intention for the site to form part of a longer-term asylum accommodation strategy.

The Secretary of State should therefore consider the proposal in the context of its stated longer-term intention and should not allow the “temporary” designation to result in materially reduced scrutiny of the development's likely long-term consequences.

If the site is ultimately intended to accommodate a long-term use of this nature, the impacts associated with that use should be fully understood and appropriately assessed now.

3. The stated justification for urgency is no longer persuasive

The applicant's supporting statement anticipated “Urgent Crown approval by late August 2026” as necessary to protect its delivery programme. That date has now passed without a decision.

This raises a significant question as to whether the circumstances relied upon to justify the use of an accelerated Urgent Crown process continue to apply in the form originally presented.

The national importance case also relies upon the proposition that pressures arising from the asylum accommodation situation “may… amount to a civil emergency”. That wording is inherently qualified and does not establish, on its face, that the circumstances amount to a civil emergency requiring the normal planning process and associated opportunities for scrutiny to be displaced.

Given that the applicant's own stated timetable has already moved beyond the date identified as critical, the Secretary of State should carefully reconsider whether the exceptional urgency relied upon to justify this procedure remains established.

4. The site lacks fundamental infrastructure necessary for a development of this scale

The application documents indicate that the site currently lacks mains electricity, a sewage connection and a fresh water supply.

The proposed response includes reliance upon temporary diesel generators for electricity and tanker-delivered water. This raises serious questions about the suitability and resilience of the site for accommodating up to 1,256 people.

These are not minor or peripheral infrastructure matters. Electricity, potable water, wastewater and associated services are fundamental requirements for a development of this scale, particularly one involving residential accommodation and the associated health, welfare and safeguarding responsibilities.

The proposed reliance upon diesel generation also gives rise to potentially significant impacts, including noise, local air quality impacts and carbon emissions. Those impacts would be particularly concerning if, as the applicant's documentation suggests, the site is ultimately intended to form part of a longer-term accommodation solution.

The proposal should not be permitted unless there is compelling evidence that adequate, reliable and sustainable infrastructure can be provided and maintained for the full duration and scale of the proposed use.

5. The proposal benefits from reduced environmental scrutiny
The proposed use is being considered under the Urgent Crown development provisions, under which certain normal statutory requirements do not apply in the same way. In particular, permissions granted under section 293C of the Town and Country Planning Act 1990 are excluded from the mandatory biodiversity net gain condition under Schedule 7A, paragraph 17(a)(ii).

This is particularly concerning in the context of a development of this scale and location.

The EIA screening direction has also concluded that the proposal does not constitute “EIA development”. Nevertheless, the application has required detailed consideration of matters including flood risk, drainage, ecology, heritage, unexploded ordnance and habitats.

The need for this range of technical assessments demonstrates that the site presents a number of significant environmental and physical constraints that require careful consideration.

The fact that the proposal is being advanced through a procedure involving exemptions or reduced requirements in relation to certain environmental safeguards should not result in those impacts receiving less rigorous consideration. The

Secretary of State should ensure that the absence of a conventional EIA or biodiversity net gain requirement is not treated as evidence that the environmental impacts are insignificant.

6. The site's previous history warrants particular caution
There is a significant history of proposals for asylum accommodation at this site.

In 2001, Bicester was selected for the government's first pilot asylum accommodation centre. The proposal was subsequently cancelled in 2005 following substantial expenditure on planning and design and sustained local opposition, which contributed to delays and increased costs.

More recently, a proposal to accommodate approximately 750 people at MOD Bicester was refused by an independent Planning Inspector.

These previous proposals are directly relevant to the question of whether this site is appropriate for accommodation of this nature and scale. The current application should therefore explain clearly what has materially changed since those earlier proposals and why the issues that previously arose would not arise again.

The fact that the site has previously been the subject of unsuccessful proposals for large-scale asylum accommodation makes it particularly important that the current application demonstrates, rather than simply asserts, that the site is now suitable.

Conclusion

Taken together, these matters raise serious concerns about the suitability of the site, the adequacy of the evidence and consultation process, the justification for using an accelerated Urgent Crown procedure, the resilience of the proposed infrastructure, the environmental implications of the development and the extent to which the supposedly temporary use may develop into a longer-term accommodation facility.

In particular, the combination of a very compressed representation period, significant infrastructure deficiencies, unresolved environmental and physical constraints, and the applicant's stated intention that the site may ultimately be expanded for long-term asylum accommodation warrants careful and full scrutiny.

For these reasons, I respectfully request that the Secretary of State refuse application ref. PCU/RARE/C3105/3378843 in full.

Yours faithfully,

[redacted]