From: [redacted]
To: Crown Casework; planning@cherwell-dc.gov.uk; bicester.garrison@cherwell-dc.gov.uk
Cc: calum.miller.mp@parliament.uk; piddington.parish.clerk@googlemail.com; wpws@wrongplanwrongsite.org.uk
Subject: Formal Submissions – Urgent Crown Development Application: MOD Bicester Site A (PCU/RARE/C3105/3378843) - Objection
Date: 12 September 2026 22:04:35

[redacted]

Dear Sir/Madam,

I am writing as a concerned member of the public and senior Health, Safety & Environmental professional regarding the Urgent Crown Development Application for **MOD Bicester Site A (Ref: PCU/RARE/C3105/3378843)** to house up to 1,256 single adult male asylum seekers adjacent to Piddington.

I am formally submitting two linked representations:

1. **Primary Formal Objection:** Setting out critical HSE, safeguarding, emergency-service capacity, and risk-governance concerns, including the unaddressed discrepancy between the 1,256 proposal and the official Government-commissioned UXO assessment of 31 March 2026 which evaluated **3,510 occupants**.

2. **Supplementary Representation:** Formally challenging the Secretary of State's direction withholding documents under **Section 293B(11) of the Town and Country Planning Act 1990**, which prevents the public from examining essential site capacity, emergency planning, and community risk assessments.

Please find the complete text of both submissions set out in full below. I request that both representations are formally logged and considered by the decision-maker in determining this application.

Yours faithfully,

[redacted]

REPRESENTATION 1: PRIMARY FORMAL OBJECTION

Dear Sir/Madam,

I am writing to formally object to the proposed development at MOD Bicester Site A for accommodation of up to **1,256 single adult male asylum seekers aged 18–65**.

I make this representation not simply as a concerned member of the public, but [redacted]

Applying those basic and well-established principles of risk management to this proposal raises serious concerns.

The neighbouring village of Piddington has a population of approximately 350 people. The proposed maximum occupancy of **1,256 people – specifically single adult males aged 18–65 – is approximately 3.6 times the entire population of the neighbouring village.**

That disparity does not, in itself, establish that harm will occur. However, competent risk assessment does not require certainty that an incident *will* happen before action is justified. It requires consideration of **reasonably foreseeable events, the persons who may be affected, likelihood, potential severity, the adequacy and resilience of controls, and the consequences of control failure.**

1. Scale, concentration and reasonably foreseeable risk

Introducing a population of up to 1,256 people at a single location adjacent to a community of approximately 350 represents a substantial and immediate change in local population, activity and demand.

A competent assessment should therefore consider not merely routine operation but credible adverse scenarios, including security failures, safeguarding incidents, public disorder, medical emergencies, fire and evacuation, transport incidents, increased demand upon emergency services and situations involving multiple simultaneous events.

It should demonstrate that proposed controls remain effective during abnormal and reasonably foreseeable adverse circumstances, rather than simply assuming that administrative and security arrangements will operate as intended at all times.

2. Safeguarding and vulnerable members of the surrounding community

Any meaningful assessment should specifically consider those who may be particularly vulnerable, including **children, young people, elderly residents, people living alone and other vulnerable individuals within surrounding communities.**

Local residents are entitled to understand what safeguarding assessment has been undertaken, what scenarios have been considered and what preventative and mitigating controls will be implemented.

This is not an assertion that asylum seekers collectively represent a danger. They plainly cannot reasonably be treated as a homogeneous risk group.

The legitimate risk-management issue is whether the Government has adequately assessed the implications of accommodating **1,256 single adult males aged 18–65 at one location adjacent to a community of approximately 350 people**, including the uncertainties associated with managing a population of this scale.

3. Screening, identification and individual risk management

There should be complete transparency regarding the **identity, security and safeguarding checks** undertaken before individuals are placed at this site.

The relevant authorities should clearly establish:

- what identity and security checks are undertaken before placement;
- what information concerning an individual's background and history is available to decision-makers;
- how incomplete or unavailable information is accounted for within the risk assessment;
- what criteria would prevent an individual from being accommodated at this particular site;
- what arrangements exist where concerns are subsequently identified; and
- how identified safeguarding or security risks will be communicated and managed.

From a professional risk-management perspective, **absence of information cannot automatically be treated as evidence of absence of risk**. Where uncertainty exists, that uncertainty should itself be recognised and appropriately controlled.

4. Police, NHS, fire, ambulance and emergency-service capacity

A development of this magnitude should be supported by demonstrable evidence that the relevant public services have sufficient capacity to manage the additional foreseeable demand without materially reducing the level of service available to the existing community.

That includes Thames Valley Police, ambulance services, local NHS provision, fire and rescue services and other relevant agencies.

It is insufficient simply to state that emergency arrangements or security provisions will exist.

There should be evidence-based consideration of **response times, simultaneous incidents, escalation procedures, medical emergencies, public-order incidents, safeguarding events, evacuation requirements and the cumulative additional demand placed upon existing services.**

5. The unexplained 3,510-person figure contained within an official Government risk assessment

Of particular concern is the fact that an official **Unexploded Ordnance Risk Assessment commissioned by the Government Property Agency and dated 31 March 2026** described the proposed scheme as involving accommodation for **3,510 service users**.

Importantly, **3,510 does not appear merely once as an isolated typographical error; the figure appears more than once within the assessment.**

I recognise that the current application seeks permission for a maximum of 1,256 people and that the Government has subsequently described the 3,510 figure as an outdated estimate.

However, the difference between **1,256 and 3,510 people is substantial** and, in my view, warrants a transparent and documented explanation.

I therefore request clarification of:

- when the figure of 3,510 was first identified;
- who supplied that figure to the organisation undertaking the risk assessment;
- what calculation, requirement or assumption produced that specific number;
- whether 3,510 represented an earlier proposed capacity, design capacity, feasibility scenario or potential maximum occupancy;
- when and why the proposed capacity was subsequently reduced to 1,256;
- whether any infrastructure, utilities, accommodation, security arrangements or other elements of the development have been designed with capacity materially exceeding 1,256; and
- whether any future increase beyond 1,256 could be contemplated without an entirely new planning and public-consultation process.

The existence of an official Government-commissioned assessment referring specifically to **3,510 occupants deserves a proper audit trail and explanation**, rather than simply being dismissed as an outdated figure.

6. Risk assessment must consider control failure and credible worst-case scenarios

One of the fundamental principles of competent risk management is that an assessment cannot be based solely upon the assumption that everything operates according to plan.

The appropriate question is not simply:

“Can 1,256 people be accommodated on this site?”

The questions should include:

What can reasonably foreseeably go wrong?

Who could be affected?

What is the potential severity of the consequences?

What is the likelihood before controls are applied?

What preventative and mitigating controls will be implemented?

What is the residual risk following those controls?

Who is accountable for each control?

How will control effectiveness be monitored?

What happens if one or several controls fail simultaneously?

These are elementary principles of professional risk assessment and should be demonstrably applied to a development of this magnitude.

7. Cumulative and community risk

Individual assessments of transport, policing, healthcare, fire safety, safeguarding, security and infrastructure should not be considered entirely in isolation.

The decision-maker should also consider their **cumulative effect**.

A series of risks individually assessed as tolerable can produce a materially different risk profile when introduced

simultaneously into a small existing community.

The proposed population is approximately **3.6 times the population of Piddington itself**. That degree of population concentration makes a comprehensive cumulative assessment particularly important.

8. The consequences of incorrect assumptions

If assumptions concerning security, safeguarding, policing, healthcare, transport, emergency response or community impact subsequently prove incorrect, it will be **local residents, those accommodated at the site and frontline public services** who experience the consequences.

It is therefore entirely reasonable to expect an exceptionally robust evidential standard before this proposal is approved.

Legitimate concerns regarding **scale, location, proportionality, safeguarding, emergency-service capacity, infrastructure and foreseeable risk** should be answered with evidence rather than reassurance.

For these reasons, I formally object to the application in its present form and request that approval is **not granted unless and until the decision-maker can demonstrate, through robust and transparent evidence, that reasonably foreseeable risks have been comprehensively identified, assessed and appropriately controlled.**

I further request that the discrepancy between the **3,510-person capacity recorded in the March 2026 Government-commissioned risk assessment and the current proposed maximum of 1,256** is formally addressed during determination of the application.

As a Health and Safety professional, I would expect a proposal capable of affecting this number of people to demonstrate a clear and auditable methodology encompassing:

Hazard → Persons at Risk → Initial Risk → Preventative/Mitigating Controls → Residual Risk → Responsible Party → Monitoring → Review and Escalation.

The existing community, those proposed to be accommodated at the site and the emergency services expected to support it deserve no lesser standard of risk governance.

I respectfully request that this objection is recorded in full and taken into consideration when determining the application.

Yours faithfully,

[redacted]

REPRESENTATION 2: SUPPLEMENTARY REPRESENTATION ON SECTION 293B(11)

Dear Sir/Madam,

Further to my representation regarding MOD Bicester Site A, I note that the published application page states:

"The Secretary of State has directed that information contained in the following documents is 'sensitive' under section 293B(11) of the Town and Country Planning Act 1990. Consequently, the documents are not disclosed…"

However, the public page does not appear to identify **what those withheld documents are**.

I fully recognise that genuinely operationally sensitive information should not be published where disclosure could compromise security.

Nevertheless, given the significant discrepancy already identified between the **3,510 service users recorded in the March 2026 Government-commissioned risk assessment and the 1,256 now proposed**, I request clarification, insofar as this can lawfully be provided, of:

(1) the number of documents/information items withheld under section 293B(11);

(2) their general subject/category;
(3) whether any withheld material relates to **site capacity, potential maximum occupancy, future expansion, security/community risk assessments, safeguarding, policing or emergency planning**; and
(4) confirmation that the withheld material has been considered by the decision-maker when assessing the cumulative risks associated with the proposal.

I am **not requesting disclosure of operational security information**. I am requesting sufficient transparency to establish whether information material to the planning and risk assessment of this development exists outside the documents upon which the public is currently being invited to make representations.

Please treat this as a supplementary representation to my previous objection.

Yours faithfully,

[redacted]