From: [redacted]
To: Crown Casework
Cc: calum.miller.mp@parliament.uk; wpwsobjection@gmail.com
Subject: Environmental Objection to Urgent Crown Development Application PCU/RARE/C3105/3378843 – MOD Bicester Site A
Date: 12 September 2026 11:29:32

[redacted]

Dear Secretary of State,

I am writing to object to planning application **PCU/RARE/C3105/3378843**(Cherwell reference **26/01833/CROWN**) for the proposed temporary asylum accommodation centre for up to 1,256 people at MOD Bicester Site A.

My objection is confined to **material environmental planning considerations**, particularly the unresolved foul-water and surface-water drainage arrangements, the relationship with the River Ray catchment and protected wetland habitats, flood risk, biodiversity, artificial lighting, landscape impacts and noise.

Having considered the applicant's own environmental and drainage documentation, I do not believe that sufficient evidence presently exists to demonstrate that a development of this scale can proceed without unacceptable environmental effects.

1. The Foul-Water Disposal Solution Has Not Been Established

A particularly serious concern is that the application does not appear to establish a final, proven means of disposing of foul water generated by the development.

The applicant's **Drainage Design Statement** states that the preferred approach would be connection to a municipal wastewater treatment works. However, at the time the application documentation was prepared, definitive information was not available concerning either the capacity of the receiving treatment works or the capacity and connectivity of the infrastructure necessary to convey the additional sewage to it.

The report therefore considers a fallback arrangement involving a **new wastewater treatment works (WwTW) constructed at Site A, with treated final effluent discharged directly to a watercourse**.

Importantly, the applicant's own Drainage Design Statement states that:

"At present, there are no apparent watercourses that seem suitable

for discharge within the curtilage of the site."

It further acknowledges that the potential receiving watercourses considered for such a discharge have been identified through a **desktop study only**, and that a site visit and modelling would still be necessary to establish whether they are suitable to receive treated effluent.

The final outfall location has therefore not been determined.

This is not a minor engineering detail. The identity, condition, hydraulic capacity, ecological sensitivity and downstream destination of the receiving watercourse are fundamental to determining whether the environmental consequences of the development are acceptable.

2. Scale of the Proposed Wastewater Discharge

The potential volume involved is considerable.

The applicant's drainage calculations assume wastewater generation of approximately **140 litres per person per day** and design for up to **1,256 service users plus approximately 130 staff**.

On those assumptions, full occupation could generate approximately **194,000 litres of wastewater every day**, before allowing for the additional groundwater infiltration contemplated by the applicant's drainage design.

The applicant further acknowledges that an on-site treatment works would require a **new Environment Agency discharge permit and an agreed final-effluent discharge location**.

The design presently assumes stringent treatment requirements, potentially approximately **5 mg/l ammonia and less than 1 mg/l total phosphorus**, but those figures remain design assumptions rather than an agreed environmental permit.

The Drainage Design Statement itself acknowledges that assessment of a discharge permit may require consideration of effects upon receiving waters, Water Framework Directive objectives and protected habitats.

I therefore consider it premature to approve a major development before the ultimate destination and environmental acceptability of potentially approximately 194 cubic metres per day of foul-water flow have been satisfactorily established.

3. River Ray Catchment and the Wider Otmoor Wetland System

This uncertainty is particularly important because Site A lies within the wider **River Ray catchment**.

The applicant's own Drainage Design Statement acknowledges that the multiple ditches and watercourses surrounding the site indicate that surface water is ultimately conveyed into local channels and, because of the site's catchment location, is **expected ultimately to discharge towards the River Ray**.

The River Ray should not be viewed simply as an isolated drainage channel.

It forms the principal watercourse through an environmentally important low-lying floodplain system which extends towards**Otmoor**, including the nationally important wetland habitats associated with**Otmoor SSSI and the RSPB Otmoor nature reserve**.

I do not suggest that the application documents prove that effluent discharged from Site A would flow directly into RSPB Otmoor. They do not.

My concern is instead that the applicant has **not yet established the final foul-water outfall**, while surface water is expected to enter the River Ray catchment. Until the precise receiving watercourse and downstream pathway are established, it is not possible to dismiss potential downstream and cumulative effects merely on the basis of distance from Otmoor.

The proper assessment should therefore trace the drainage pathway from Site A through every relevant ditch and ordinary watercourse into the wider River Ray system and determine whether changes in water quantity, timing, nutrient loading or water quality could affect downstream wetland habitats.

This is particularly important in a low-gradient floodplain landscape in which hydrology is fundamental to ecological function.

4. Natural England Has Not Ruled Out Hydrological Connectivity

There is compelling evidence that this issue requires further investigation.

Arncott Bridge Meadows SSSI lies approximately 1.8 km from the development.

Natural England initially advised that the proposal could have

potentially significant effects on Arncott Bridge Meadows SSSI and requested further information concerning **hydrological impact pathways between the application site and the SSSI**.

Following further information from the applicant, Natural England stated that:

“hydrological connection between the site and the SSSI cannot be ruled out”

and advised that the project must demonstrate that it will not alter the existing hydrological regime and thereby risk affecting the interest features of the downstream SSSI.

Natural England also specifically advised that the drainage system should contain sufficient treatment stages to prevent degradation of water quality affecting Arncott Bridge Meadows SSSI.

Crucially, Natural England’s subsequent advice also records an expectation that foul water would connect to the mains and states that **if this is not the case, Natural England would need to be consulted again regarding the alternative arrangement**.

That is highly relevant because the applicant’s own drainage strategy presently retains an on-site wastewater treatment works discharging to a watercourse as the design fallback.

I therefore submit that planning permission should not be granted on the assumption that this environmental question can simply be resolved later.

5. Surface-Water Outfalls Are Also Not Fully Established

There is similar uncertainty concerning surface-water drainage.

The applicant’s **Utilities and Infrastructure Assessment** states that no public surface-water sewer records have been identified within Site A and that **downstream connectivity is unknown**.

It records multiple ditches and watercourses across and adjacent to the site and states that these probably discharge into local channels within the River Ray catchment.

The same assessment records evidence of **ponding and localised flooding even during dry conditions**, describes existing drainage assets as poorly maintained and largely non-operational, and states that further

surveys are required to confirm outfall locations, connectivity, capacity, condition and levels.

The proposed Sustainable Drainage System is itself described as **indicative**and based upon assumptions because of limited surveys, absence of ground investigation, lack of CCTV drainage surveys and incomplete site information.

The more detailed Drainage Design Statement similarly acknowledges that its calculated attenuation volumes assume that a viable outfall exists, while stating that **the outfall location and receiving system have not yet been confirmed**.

The applicant consequently accepts that additional storage or an alternative drainage strategy may eventually be required.

This degree of uncertainty is concerning for a development of this scale.

6. Existing Flooding and the Need for a Precautionary Approach

The application site is situated within a low-lying landscape containing numerous ditches, ordinary watercourses and floodplain habitats.

The applicant has itself observed ponding and localised flooding and acknowledges that infiltration is limited, with much rainfall flowing over the surface towards nearby channels.

The development would introduce substantial new buildings, roads, paths, hardstanding and infrastructure.

While the proposed SuDS system aims to restrict discharge rates, the applicant’s own documentation states that its storage calculations and outfall arrangements remain preliminary and require detailed hydraulic modelling.

Under **Policy ESD 6 of the Cherwell Local Plan**, development must appropriately manage and reduce flood risk.

Policy ESD 7 requires development to use Sustainable Drainage Systems for management of surface-water runoff.

These requirements are reinforced by **paragraphs 181 and 182 of the National Planning Policy Framework**, which require development not to increase flood risk elsewhere and require major developments affecting drainage to incorporate appropriate sustainable drainage systems capable of controlling flow rates and reducing runoff volumes.

In my view, those tests cannot safely be regarded as satisfied where the receiving systems, outfalls and hydraulic capacities remain incompletely established.

7. Water Quality – Policy ESD 8 and the NPPF

Cherwell Local Plan Policy ESD 8 – Water Resources seeks to maintain water quality and ensure that adequate water resources and wastewater infrastructure are available.

The Drainage Design Statement itself records that the site lies within a **Nitrate Vulnerable Zone and a Drinking Water Safeguarding Zone associated with surface-water abstraction**, increasing the sensitivity of the receiving environment and potentially imposing additional constraints upon wastewater quality and nutrient loading.

This is especially important when considered alongside the possible discharge of treated effluent from an on-site WwTW.

The environmental assessment should therefore demonstrate conclusively the effects of the development upon:

phosphorus, ammonia, nitrates, suspended solids, biological oxygen demand and other relevant pollutants; the dilution capacity and ecological condition of the receiving watercourse; low-flow conditions; flood conditions; accidental releases or treatment-plant failure; and cumulative nutrient loading within the River Ray catchment.

Paragraph **187 of the NPPF** requires planning decisions to prevent development from contributing to unacceptable water pollution and, wherever possible, to improve local environmental conditions including water quality.

8. Biodiversity – Arncott Bridge Meadows, River Ray and Otmoor

The hydrological concerns cannot properly be separated from biodiversity.

The River Ray floodplain supports a network of wet grassland, meadow, ditch and wetland habitats.

Arncott Bridge Meadows SSSI, approximately 1.8 km from Site A, is sufficiently sensitive that Natural England has expressly stated that hydrological connectivity with the development cannot presently be ruled out.

Further downstream within the wider River Ray landscape lies **Otmoor**, including Otmoor SSSI and the RSPB Otmoor reserve, an exceptionally important complex of grazing marsh, reedbeds and wetland habitat supporting important bird populations.

The planning authority must therefore consider not merely individual protected-site boundaries but the functioning of the**wider ecological and hydrological network**.

That requirement is reflected in **Cherwell Local Plan Policy ESD 10 – Protection and Enhancement of Biodiversity and the Natural Environment** and **NPPF paragraphs 187 onwards**, which require protection of biodiversity and ecological networks and consideration of natural capital at catchment and landscape scale.

9. Incomplete Environmental Evidence

Perhaps the most important issue is the number of matters which the applicant's own Drainage Design Statement says remain unresolved.

Its conclusions state that the drainage proposals remain at **concept stage**, based upon assumptions arising from incomplete information.

Among the further work recommended by the applicant itself are:

CCTV drainage surveys; refined topographical surveys; ground investigation and groundwater monitoring; identification and confirmation of suitable outfalls; surveys of receiving watercourses and drainage ditches; assessment of their hydraulic capacity; detailed hydraulic modelling; detailed design of attenuation and pollution-control measures; and assessment of environmental and permitting requirements for discharges.

These are fundamental matters in determining environmental acceptability.

In my view, it would be inappropriate to establish the principle of a development accommodating 1,256 people and then attempt to establish afterwards where its sewage and surface water can safely be discharged.

10. Noise, Disturbance and the Wastewater Treatment Plant

There are also wider environmental disturbance issues.

A development of this scale would introduce extensive vehicle movements, shuttle buses, servicing, generators, security activity, artificial lighting and the day-to-day activity associated with more than

1,250 residents and substantial numbers of staff.

The applicant's drainage report additionally recognises that an on-site wastewater treatment plant itself creates**noise and odour considerations**.

It states that odour control is likely to be required and that modelling should be undertaken. It also identifies potential noise-control requirements.

This adds another industrial/institutional source of disturbance within what is otherwise a predominantly rural environment.

This should be assessed cumulatively alongside existing sources of noise in the locality, including the B4011 and activity associated with **HMP Bullingdon**, rather than considering each source in isolation.

These matters engage **saved Policy ENV1 of the Cherwell Local Plan 1996**, together with the NPPF's requirements concerning pollution, noise and protection of the natural environment.

Conclusion

I consider the water and environmental evidence particularly troubling because these concerns arise not from speculation but substantially from **the applicant's own technical reports and Natural England's advice**.

The present evidence establishes that:

- downstream connectivity of parts of the existing surface-water system is unknown;
- surface water is nevertheless expected ultimately to enter channels within the **River Ray catchment**;
- existing drainage has shown ponding and localised flooding;
- the proposed surface-water outfalls have not all been confirmed;
- attenuation calculations remain preliminary;
- the capacity of a municipal foul-water solution had not been confirmed;
- the fallback design therefore includes a **new on-site wastewater treatment works discharging treated sewage effluent to a watercourse**;
- no final effluent outfall has been agreed;
- the applicant states that there is no apparently suitable receiving watercourse within the site itself;

- potential receiving watercourses were identified by desktop study and still require field investigation and modelling;
- an Environment Agency discharge permit has not yet established the acceptable final discharge arrangement;
- the receiving environment includes a Nitrate Vulnerable Zone and Drinking Water Safeguarding Zone;
- **Natural England states that hydrological connectivity between Site A and Arncott Bridge Meadows SSSI cannot be ruled out**; and
- Natural England has requested re-consultation if foul water is not ultimately connected to the mains.

These are not peripheral details. They go directly to whether this development can be accommodated without unacceptable effects upon **flood risk, water quality, the River Ray catchment and protected wetland ecosystems**.

The Urgent Crown Development procedure should not result in a reduced standard of environmental assessment.

In accordance with **Cherwell Local Plan Policies ESD 6, ESD 7, ESD 8 and ESD 10**, the National Planning Policy Framework, and the precautionary approach appropriate to nationally important ecological sites, I respectfully request that the Secretary of State **refuse planning permission**.

At the very least, permission should not be granted until the applicant has established and published for proper scrutiny:

1. the definitive foul-water disposal solution;
2. the precise location of any wastewater-treatment-works discharge;
3. the receiving watercourse and complete downstream pathway;
4. the definitive surface-water outfalls;
5. hydraulic modelling of the receiving ditches and watercourses;
6. full water-quality and nutrient-impact assessment;
7. the relationship of those pathways to the River Ray and Arncott Bridge Meadows SSSI;
8. appropriate assessment of cumulative downstream effects within the wider River Ray/Otmoor wetland system;
9. the required Environment Agency permitting position; and
10. Natural England’s response to the final foul-water and surface-water proposals.

Until that work has been completed, there is insufficient evidence to conclude that the development would not cause unacceptable environmental harm.

Yours faithfully,

[redacted]