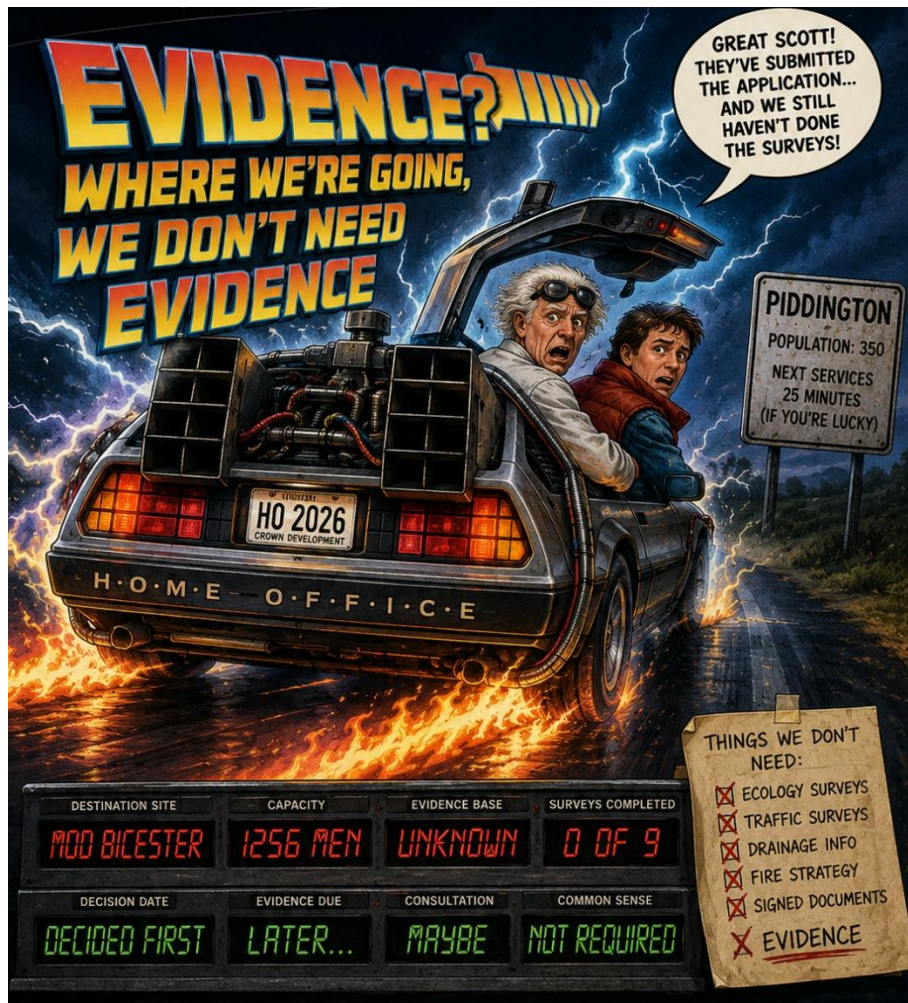

THE PIDDINGTON EYE

"Nolite Te Bastardes Carborundorum, But Also Please Fill In The Consultation Form"

ISSUE 2 | SEPTEMBER 2026 | FACTUAL PUBLICATION (WELL, MOSTLY) | PRICE: £0.00 (PROOF READ MORE THAN THE HOME OFFICE)



Exclusive The bomb report that assessed 3,510 men, not 1,256

Scoop "Natural England have been contacted however, a response has not yet been received" (it had arrived 29 days earlier)

Geography The traffic survey of the B1104, a road in Essex

Sleep tight Bedrooms 45 metres from the sewage works

Staffing Every document, prepared, checked and approved by a Mr XX

Equality "Certain protected characteristics won't apply"

The Home Office has finally shown us its homework for 1,256 men at Site A. It is 25 documents long, nobody signed it, nine ecological surveys have not been done, the traffic figures are labelled with a road in Essex, and the fire strategy has no exits

FROM THE EDITOR'S (PPC) DESK

On **6 July 2026** the Home Office submitted an Urgent Crown Development application for the temporary change of use of Site A, MOD Bicester, to non-detained asylum seekers accommodating **up to 1,256 single adult men**, on 10.22 hectares, for at least ten years.

On **26 August 2026** the Secretary of State directed that no Environmental Statement is required. The full document set reached the public on **2 September 2026**. The application is yet to be consulted but now is the time to take up arms read this document and start arguing against the incoming consultation which the public will likely be bypassed on to get this first application thrown out.

Issue 1 dealt with the announcement and the foreseeable proposal. This issue deals with the actual paperwork that hit our desk circa 11am on Wednesday 2nd September 2026.

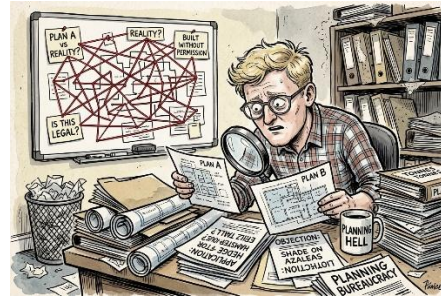
As in Issue 1, sourced material is flagged **FACTUAL** and printed in red; satire is flagged **SATIRE** and printed in green. Every quotation here, unless flagged SATIRE, is word for word from the Home Office's own documents, typos included.... There are many!!!!

We asked to see the evidence. We have now seen something that vaguely resembles evidence. Lets tuck in.

In Issue 1 we complained, at some length, that a decision of this scale was being taken about our village before anybody had produced any evidence. We were told to wait for the application. The application has arrived. It runs to thirty three documents and several hundred pages, and we have now read all of it,

which is more than can be said for the people who wrote it.

Here is what reading it does to a person. Not going to lie its been an interesting 48 hours and a long read. But at least you don't have to.



The basic description for initial context:

“Full Planning Application for Urgent Crown Development comprising the temporary change of use of the defence storage & distribution centre site (MOD Bicester A - site) in connection with the phased provision of non-detained asylum accommodation. The Proposed Development comprises the retention and change of use of Building A6, the demolition of existing buildings and structures, the erection of new modular accommodation, and the provision of space for associated health and welfare facilities, site infrastructure, waste water treatment plant, roads, access ways, security infrastructure, parking, staff accommodation and facilities, and open space and recreational areas, to accommodate up to 1,256 service user”

The Preliminary Ecological Appraisal states, in its own words, that it “cannot be considered a comprehensive assessment of the ecological interest of the site.”

The Utilities and Infrastructure Assessment states that “existing

capacities within the utility networks are yet to be determined.”

The Drainage Design Statement states that “no intrusive ground investigation has been undertaken at this stage” and that the position of the drains the accommodation will use “is currently unknown.”

The Fire Safety Strategy contains no travel distances, no occupancy figure and no firefighting water supply.

The Transport Assessment concludes that walking is not possible and recommends cycling on a road with no cycle infrastructure and a 60mph limit, or possibly 50mph, depending which government document you are holding.

The Landscape and Visual Statement was issued Final on 21 May and says on its own page 5 that “extensive surveys are ongoing.”

And on the strength of that, on 26 August 2026, the Secretary of State concluded that the proposal is “not likely to have significant effects on the environment.”

We want to be very clear about what this issue is and is not. It is not a claim that the Home Office is lying. It is something duller and, we think, worse: a claim that the Home Office has not actually done the work, has said so repeatedly in its own documents, and is asking to be given permission anyway on the basis that the work will be done later, by somebody who has not yet been appointed, under conditions that have not yet been drafted.

There is a phrase for a planning application in that condition. It is not “urgent.” It is “premature.” In the real world, premature applications are ultimately thrown out. They are refused until the necessary

information can be provided, but we ask the question today:

Will this be the case for this one? It should be.

The recurring theme of the last two months has been dates. The Equality Impact Assessment was signed off on 28 May and describes a site half the size of the one applied for. The notice telling the Ministry of Defence about the application was served on 16 June and describes the application as already submitted; it went in on 6 July. The statement certifying that everybody who had to be notified had been notified is dated 25 June, eleven days before there was an application to notify anyone about.

Five days after the application form was signed, on 30 June, the Home Office was still publicly telling residents that feasibility assessments “could take several months to complete” and “do not predetermine its future use.”

We invite readers to hold those two facts in mind at the same time, as we have been obliged to.

We are not against people seeking asylum finding somewhere safe. We are against 1,256 of them being put on an unsurveyed former ammunition depot at the end of an unlit road with no footway, on paperwork this bad.

Thirty-Three documents. Nought signatures.

The covering letter is unsigned: “Yours faithfully, on behalf of the Secretary of State for the Home Department.” So is the Article 4 notice. So is the Article 5 compliance statement. The Planning

Proposal Statement contains a reviewer sign-off table with the columns “Reviewed By / Role & Grade / Date”, and the table is empty. The Flood Risk Assessment’s prepared, checked and approved boxes are blank. The screening direction is signed “Planning Casework Unit.”

In the entire application pack, the only two human beings named are two Members of Parliament, neither of whom wrote any of it. We understand that redactions may need to be made, but what and why are they trying to hide?

A SHORT GLOSSARY OF APPLICATION-SPEAK

Quotes are genuine, verbatim, and referenced. The translations are ours. So is the exasperation.

“There is currently no pedestrian infrastructure provided along this section of the B4011, making both accesses inaccessible by foot.”

— Planning Proposal Statement, para 2.5

“There are very limited facilities in the immediate vicinity of the Site, reflecting its rural location and lack of direct pedestrian connectivity to nearby settlements. However, this is not considered to be a material constraint because the proposed development is intended to operate as a self-contained site.”

— Planning Proposal Statement, para 2.10

“All of these bus stops are accessible by cycling from the Site; walking, however, would not be possible due

to the B0411 having no pedestrian path.”

— Planning Proposal Statement, para 2.8 (the misspelling of the road is theirs)

“There is no statutory requirement for the decision maker to consider compliance with the development plan.”

— Planning Proposal Statement, para 5.1

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

— Statement on National Importance (undated)

“The Site will not carry out recycling on site. Waste will be separated into general waste and recyclable waste.”

— Planning Proposal Statement, para 4.20

“The current scheme design does not include details of lighting provision, and the co-ordination of lighting and controls strategy will be assessed during RIBA 3 as it was not possible at RIBA 2, therefore impacts from operational lighting are unknown. However, design at RIBA 3 will endeavour to support energy efficiencies ... Therefore, it is considered that there will be no likely significant effects.”

— EIA Screening Direction Request, 3 July 2026, Lighting

“The accommodation is for single adult males only; therefore, certain protected characteristics won’t apply to SUs.”

— Secretary of State’s written statement, 26 August 2026

Decided first, surveyed later: a calendar

Date	What happened
21 Nov 2025	National Grid asset enquiry submitted for the site. Declared activity type: <i>“Commercial/industrial”</i> . Declared work start date: the following day.
25/26 Feb 2026	Site visit. The MOD site team confirm the site floods frequently because two pumps have failed. Nobody could find the pumps: <i>“It was not possible to verify the existence, location, or specification of these pumps during the visit.”</i> Two application documents give two different dates for this one visit, and place the flooding at opposite ends of the site.
26 Mar – 10 Apr 2026	The one and only ecological field survey. Outside the optimal survey window. Access restricted. Bat roost assessments done from outside the buildings only.
10 Apr 2026	Habitats Regulations Assessment delivered, based on a 2025 feasibility study, concluding no hydrological pathway.
21 May 2026	Landscape and Visual Statement issued Final . States on page 5: <i>“Extensive surveys are ongoing.”</i> Assesses a scheme for 1,250.
28 May 2026	Equality Impact Assessment signed off. Describes a site of <i>“5 hectares”</i> . The application is for 10.22.
4 Jun 2026	Natural England writes: the proposal <i>“could have potential significant effects on Arccott Bridge SSSI”</i> . Asks to be re-consulted.
16 Jun 2026	Article 4 notice served on the MOD, describing the application as <i>“submitted”</i> . It has not been submitted.
25 Jun 2026	Application form signed. Article 5 statement certifies notice <i>“has been duly served on all persons required to be notified”</i> . There is not yet an application.
30 Jun 2026	Home Office factsheet tells residents assessments <i>“could take several months to complete”</i> and <i>“do not predetermine its future use”</i> . Five days after the form was signed.
3 Jul 2026	EIA screening requested. It tells the Secretary of State that Natural England <i>“have been contacted however, a response has not yet been received”</i> .
3 Jul 2026	Application submitted , enclosing the Natural England response of 4 June that had not been received. Two technical documents admitted missing.
16 Jul 2026	Home Office to Natural England: <i>“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.”</i>
20 Jul 2026	Cherwell District Council, the local planning authority, is notified. Fourteen days after submission, and seven days after the local MP.
26 Aug 2026	Screening direction: no Environmental Statement required.

STREET OF SHAME — DOCUMENT CONTROL DESK

Prepared by XX. Checked by XX. Approved by XX.

Somewhere in Britain there is a consultant called XX who single-handedly prepared, checked and approved the entire transport case for a 1,256-person development. We would like to buy XX a drink, and then some professional indemnity insurance. How can individuals be held accountable over professional and specialist documentation when there is no clear naming or even company details related to who has submitted many of the crucial documents.

[FACTUAL] The Transport Assessment for Site A has two revisions. Revision D01, dated 07/05/2026, status Draft. Revision D02, dated 07/06/2026, status Final. The “Description of Revision” field is blank for both, so there is no record of what changed. The Prepared By, Checked By and Approved By fields all read XX.

No consultancy is named anywhere in it. The Travel Plan, submitted with the application, is still marked **Draft** at revision 2 and was signed off two days before the Transport Assessment it is supposed to accompany.

The pattern holds across the pack. The Flood Risk Assessment’s prepared, checked and approved boxes are empty, and the only recorded reason for its second revision is “Second Issue following client approval” — the client being the Home Office.

The Geo-environmental Assessment was checked and approved by the same initials, SDL.

The Air Quality Note was checked and approved by the same person, SS.

The Fire Safety Strategy is credited to an entity called “The Nettlefire Fire Engineering Consultants”, a phrase used six times and which appears to exist nowhere outside that document.

The Habitats Regulations Assessment has had the names of its preparer, its reviewer and its verifier removed, leaving the sentence: “This report has been prepared by. It has been reviewed by and verified by.”

The Preliminary Ecological Appraisal describes its author only as “a Consultant Ecologist of ‘capable’ competency”. That is the profession’s own middle grade, and it is the applicant’s own description.

The Archaeological and Heritage Assessment has an empty date field, a revision numbered 0, a status of simply “Issue”, a client described as “HM Government”, and no author, no checker, no approver and no firm. The Natural England letter refers to “the professional advice of the Natural England adviser named below”. Nobody is named below.

One name survived. In the Habitats Regulations Assessment, at section 4.0, the redactor missed a citation, and the words “Pick Everard, 2025” remain. The same name is blacked out everywhere else it appears in the same document.

[SATIRE] We wrote to XX care of the Home Office to ask XX whether XX

was aware that the road XX surveyed is in Essex. XX has not replied. In fairness, XX is extremely busy and it has only been 24 hours.



The Landscape drawings: a case study in “final”

Three landscape figures were issued P02 FINAL on 21 May 2026. Their title blocks were never updated from the April preliminary issue. On two of the three, the “drawn” date is left as the template placeholder, XX. The title block fields for BSUID and Trigger Event read XX XX XX.

The key on both plans labels the development area “**Potential Development Area**”. On a final drawing. Submitted with a live planning application. For a development the Government says is urgent. How can something be kept so vague when it's looking to be commenced in construction urgently?

DOCUMENT CONTROL			
Project	Bicester A Site	Revision	D02
Client	Home Office	Status	Final
Prepared by	XX	Date	07/06/2026
Checked by	XX	Consultancy	
Approved by	XX	Signature	
Description of revision	Left blank, both revisions		

NOBODY SIGNED THIS
TWENTY-FIVE DOCUMENTS - TWO NAMED HUMANS - BOTH MISSING

The Transport Assessment’s document control block, reproduced. Two revisions, no description of what changed, and no human being anywhere on it.

And in the statutory Flood Risk Assessment

"If any new sewers were to be adopted an application would be required to [the relevant service provider] under Section 104 of the Water Industry Act 1991."

— Flood Risk Assessment, section 5.3.1, and again at 5.4.1

Square brackets and all, twice, in a submitted statutory assessment. The relevant service provider is Thames Water. Nobody filled it in. Nobody, evidently, read it.

HIGHWAY SAFETY DESK — THE HI-VIS SOLUTION

1,256 men. One footpath. And now, a vest.

In 2003 a Planning Inspector concluded that people walking these roads "would be in considerable danger from high-speed traffic". The Home Office has now answered him, in writing, for the first time in twenty-three years.

"To enter or exit the site on foot would require considerable care and SUs will be strongly encouraged to only do so using the shuttle bus provision on safety grounds. To further emphasise the potential danger, high visibility vests will be provided to those leaving on foot and further discourage this mode."

— Secretary of State's written statement of reasons, 26 August 2026

[FACTUAL] Read that again, because there are two separate admissions in it. The first is that leaving on foot is dangerous. The second is that the vests are not there to make anyone safer; they are there,

in the Government's own words, to "further discourage this mode." The safety equipment is a deterrent.

It's a crazy world where the home office is utilising personal protective equipment to deter people from leaving a site that is overpopulated and a haven for deterioration as a result of mental health conditions created by the site itself. The idea of being able to quietly leave the site to have a moment alone to get some fresh air and some quiet, is being used and weaponised.

The Transport Assessment's entire treatment of walking is four short paragraphs. It draws a two-kilometre circle on a map, announces that "*the outskirts of Piddington, Arncott and Bicester are within reasonable walking distance*", and then, in the very next sentence, concedes "*the absence of any pedestrian infrastructure serving the site*" and recommends a minibus instead. There is no walking route audit anywhere in the application. No widths, no gradients, no lighting survey, no assessment of crossing the B4011. We can do this in a few simple words: the roads are narrow, The roads are flat, There is very little street lighting, No crossings and Ultimately, no pavements.

What footway does exist is **one metre wide**. The Transport Assessment claims to have followed the Department for Transport's *Inclusive Mobility*, which sets two metres as the minimum. There are, in the applicant's own words, "*no formal dropped kerbs or crossing facilities*". The footway runs from Palmer Avenue to HMP Bullingdon, and stops.

The Travel Plan manages the contradiction inside a single paragraph: bus stops "*are located*

within walking distance of the southern site access", and, eleven words later, "*travel on foot is not recommended for local trips*." To reach the bus you must walk to it.

Meanwhile the Planning Proposal Statement, the Home Office's own lead document, says flatly that the accesses are "*inaccessible by foot*" and that walking to a bus stop "*would not be possible*". Same applicant. Same application. Two answers.



The collision analysis that analysed nothing

The Transport Assessment found three collisions in five years near the site, the most recent in March 2023. They have also produced a plan indicating free collisions that have happened in the local vicinity of the site, but potentially, sneakily, they have cut off the southern junction to the site, likely to hide some of the severity. We have noted that there is substantial danger to pedestrians, as highlighted in issue 1. It then reasoned as follows, verbatim:

"No collisions resulted in fatalities or involved pedestrians, children or HGVs ... As no collisions were recorded at the site access during the last five years, no further collision analysis is considered necessary, and it is not expected that the proposed development will have any detrimental effect on road safety."

— Transport Assessment, para 3.8.6

[SATIRE] The absence of pedestrian casualties on a road with no pedestrians is offered as proof that the road is safe for pedestrians. By the same logic, the Eye has never once been struck by a meteorite while reading a Transport Assessment, and therefore proposes to read them outdoors, forever, in a high-visibility vest.

[FACTUAL] Widnell Lane, the route to Piddington, is mentioned twice in the entire Transport Assessment, both times only as the site's southern boundary. It has no traffic count, no collision search and no assessment of any kind.

HMP Bullingdon, variously 307 metres or 500 metres away depending which government document you read, generates no traffic at all in this report. The prison's only appearance is as the title of Table 3-1: the site's public transport accessibility is assessed using the prison's bus stops.

The applicant's own automatic traffic counter recorded **44 and 45 bus movements in an entire week**, in each direction. That is roughly six buses a day past a site whose sustainability case rests on public transport.

It also recorded 85th percentile speeds of **53.6 mph and 53.4 mph** at the northern access, on a road the same document says is limited to 50 mph. The 85th percentile is defined in the report's own footnote as "often deemed the maximum safe speed for a given location."

The shuttle bus, in full

The shuttle bus is the mitigation for every walking, cycling and public transport failure identified in the application. It appears eleven times across the Transport Assessment

and Travel Plan, always in the same formula: "Shuttle buses/minibuses will be available for occasions where Service Users are required to travel."

Nowhere in either document is there a frequency, a capacity, a destination, an operating hour, an operator, a cost, a statement of whether it is free, a single vehicle movement in any trip table, or any proposed planning condition securing it. The applicant's own screening request concedes: "**No approximations on shuttle bus trips have been provided.**" In a 21st century where everything should be orientated around ensuring the environment is protected and avoiding increasing carbon emissions, it doesn't seem logical that a proposal states that 1,256 people will be served by a shuttle bus if they wanted to leave a site. Surely it'd be far more logical to locate a site near potential amenities rather than have to bus everyone everywhere.

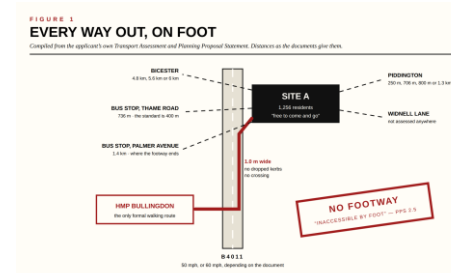
In 2003, the Secretary of State treated "the provision of a free mini-bus service" as express mitigation for this site's isolation. In 2026 it is a sentence.



HIGHWAY SAFETY DESK — THE WALK, MAPPED

Where a resident may actually walk

Drawn from the applicant's own documents. Where the application gives more than one distance for the same place, all of them are shown.



The only formal pedestrian route from the site leads to a category B prison, and still requires crossing the B4011. Everything else is verge.

[FACTUAL] Note what the diagram cannot show, because the application does not contain it. There is no walking route audit anywhere in the twenty-five documents. No widths beyond the single figure of one metre. No gradients. No lighting survey. No assessment of crossing the carriageway. No pedestrian desire lines. No assessment of Widnell Lane at all, which is the route to Piddington.

The Chartered Institution of Highways and Transportation standard the Transport Assessment itself quotes is that "public transport trips involve a walk distance of less than 400m". The nearest bus stop is 736 metres away. The next is 1.4 kilometres. The Transport Assessment quotes the standard, then quotes two paragraphs of bus-

operator guidance about being flexible with it, and moves on.

Oxfordshire County Council, the highway authority for the road, was never asked: *“no pre-application scoping discussions have been held with the local planning and highway authorities.”*

[SATIRE] We invite the Secretary of State to walk any dashed line on this page, at four o'clock on a January afternoon, in a high-visibility vest. We will provide the vest. We cannot

provide the pavement, and neither, it turns out, can she.

What was secured in 2003, and what is proposed now

The 2003 permission for a smaller version of this scheme on this land was granted on the express footing of *“improved site pedestrian access and mini-bus service for staff”*, and the 2002 application included *“pedestrian and access improvements to Palmer Avenue”*. The Secretary of State treated a **free**

mini-bus service as mitigation for the site's isolation.

The entirety of the off-site highway works proposed in 2026, at paragraph 8.1.11 of the Transport Assessment: ***“Overgrown vegetation along the grassed verge will be removed to provide clear delineation of the kerbs and carriageway. Road markings will be refreshed and reinstated as appropriate.”*** No footway. No crossing. No lighting. No secured shuttle.

EXCLUSIVE —ESSEX ??

The B1104 is a road in Essex. It is not our road.

Every baseline traffic figure and every speed figure on which the Site A capacity model depends is attributed, in the Transport Assessment, to a road 90 miles away.

[FACTUAL] The Transport Assessment refers to the **B1104 ten times** where it means the B4011. Not in passing, either. In the sections that matter:

- “B1104 northbound – 2,972 vehicles per day / B1104 southbound – 3,150 vehicles per day”
- “B1104 northbound – 53.6 mph / B1104 southbound – 53.4 mph”
- “B1104 northbound – 3,066 vehicles per day...”
- And in the list of tables: “Table 5-5: Traffic Impact – B1104”

The comparator site the Transport Assessment relies on for its trip generation, RAF Wethersfield, is at Sculpins Lane, Braintree, **Essex**. The B1104 is in Essex. This is not a typo. It is a fingerprint.

The whole operational traffic case for Site A is transferred wholesale from Wethersfield, on the following stated assumptions:

- “It has been assumed that all LGV and HGV trips logged during the survey represent service vehicles and cars represent staff / visitor movements.”
- “It has been assumed that all staff trips to and from the site are made by single occupancy cars.”

- “It should be noted that the staff shift times at RAF Wethersfield differ to the proposed development at Bicester.”

Wethersfield's peak hours were recorded as 0500–0600 and 1700–1800. Bicester's were recorded as 0700–0800 and 1600–1700. The shift times are conceded to be different. The data was transferred anyway. Wethersfield's actual occupancy on the day of the survey is never stated.



At the wrong place.

The model that warned them, four times

Printed on the face of every one of the four junction capacity runs that produce the conclusion of *“plenty of spare capacity”*:

“Warning | Major arm width | For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.”

“Warning | Vehicle Mix | HV% is zero for all movements / time segments.”

— Transport Assessment, Appendix G, junction capacity output

The carriageway width entered into the model is **5.90 metres**. The Transport Assessment's own description of the road says it *“measures approximately 6.5m to 7.0m”*. And three of the four runs model the junction with **zero**

heavy vehicles, on a scheme that puts 16.5-metre articulated lorries, refuse vehicles and 15-metre coaches through it, on a road where the applicant's own counter logged roughly 1,300 lorries a week in each direction.

The modelled evening peak, for a 24-hour establishment housing 1,256 people with 147 parking spaces and shift-working staff, is **21 vehicle movements an hour**. The modelled figure is identical in 2027 and in 2031. The development is assumed to generate not one additional trip in five years.

[FACTUAL] The Transport Assessment also records, in its own words: *"Due to the planning application route being used and the fast-track nature of the proposals no pre-application scoping discussions have been held with the local planning and highway authorities prior to the preparation of this TA."*

Oxfordshire County Council, the highway authority for the road in question, was not asked.

[SATIRE] The Eye has driven the B1104. It is a perfectly pleasant road through Great Bardfield and Finchingfield, and we can confirm it has nothing whatever to do with Piddington, although in fairness it does have a footpath.

The Travel Plan that plans nobody's travel

"This TP is targeted at staff employed to work at the site ... This TP therefore addresses staff and visitors only." A Travel Plan for a development of 1,256 residents which, by its own terms, plans the travel of none of them.

Its baseline is the **2011 Census**. The 2021 Census was rejected as unrepresentative because of Covid; the National Travel Survey was rejected for sample size. The document then says its own 2011 baseline *"should be treated with caution"*. Its target is *"a 10% reduction in motorised vehicle movements compared to the submitted baseline travel data"*. There is no submitted baseline travel data. The Travel Plan says so itself, at paragraph 7.2.1.

It also proposes monitoring *"on a biannual basis (in years 1, 3 and 5)"*, lists five objectives twice described as four,

and refers to Upper Heyford as *"Upper Hayford"*, a place roughly 20 kilometres away on the wrong side of Bicester.

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Why this page matters

There is still no economic impact assessment anywhere in the application, for Bicester Village, for local trades, or for anybody else. There is no Statement of Community Involvement, no record of any pre-application consultation with residents, and no Health Impact Assessment. The Home Office's entire published commitment to community engagement, at paragraph 1.11 of the Planning Proposal Statement, is: *"A public-facing factsheet will be published on GOV.UK."* The Equality Impact Assessment says non-statutory engagement *"may be undertaken"*.

ENVIRONMENT DESK — NINE SURVEYS, NONE DONE

“This report cannot be considered a comprehensive assessment.”

That is not our verdict on the ecological evidence. It is the applicant’s own ecologist, on page 8 of the applicant’s own report.

[FACTUAL] The entire ecological evidence base for a 1,256-person development on ten hectares of a wildlife-rich former ordnance depot is **one field survey**, carried out between 26 March and 10 April 2026, with restricted access, outside the optimal window, by a consultant the report describes as being of “capable” competency.

The report’s own limitations section says the rest:

- “The survey was undertaken in late March, which is just outside the optimal survey window.”
- “Access was possible to all areas of the site except for those that were not permissible by the Barracks, with preliminary roost assessments (PRAs) of buildings only completed on the exterior of buildings.”
- “To determine presence or likely absence of protected species usually requires multiple visits at suitable times of the year. This survey ... from only a single visit.”
- “No historic ecological surveys relevant to the site have been identified.”

Note the second one. The bat roost assessments on the buildings were carried out **from outside the buildings**. The buildings are the ones being demolished.

The nine surveys that have not happened

Listed in the Home Office’s own Planning Proposal Statement, paragraph 7.34, in the future tense:

1. Arncott Bridge SSSI Impact Zone: “mitigation requirements to be discussed with Natural England”
2. Badgers: pre-construction checks recommended
3. Hazel dormouse: “further site surveys are required”
4. Bats (roosting): survey required
5. Bats (in trees): survey required

6. Bats (foraging and commuting): activity survey required
7. Breeding birds: “further surveys ... are required”
8. Great crested newts: “further assessment required”
9. Reptiles: “a reptile survey is required and will be carried out”

Add barn owl and terrestrial invertebrates from the screening request, and the applicant’s ecologist notes “the likely presence of barn owl”.

And then, at paragraph 7.35, before a single one of those surveys exists:

“The proposed development would incorporate sufficient ecological mitigation to prevent or minimise any adverse impacts on protected species and habitats.”

— Planning Proposal Statement, para 7.35

[SATIRE] We have not measured our garden, but we can confirm the fence will fit.

[FACTUAL] The desk study was run against the **Buckinghamshire and Milton Keynes** Environmental Records Centre. Piddington is in Oxfordshire. We can find no reference anywhere in the application to a search of the Thames Valley Environmental Records Centre, which is the records centre for this county. We have put that to the Home Office as a question rather than a finding, and await the reply with the enthusiasm of people who have read the Article 5 compliance statement.

Sites of Special Scientific Interest were searched to a radius of two kilometres. Protected species records were searched to two kilometres. The Habitats Regulations Assessment set its zone of influence at 15 kilometres. The nearest European site, Oxford Meadows SAC, is 15.8 kilometres away. It therefore missed the circle by 800 metres, and the screening contains no assessment of any named European site at all.

Otmoor SSSI is 5.5 kilometres away, well outside the ecologist’s two-kilometre search. The Secretary of State’s written statement nonetheless reasons: “Otmoor SSSI has not been identified within the Preliminary Ecological Appraisal to be a risk”. It could not have been. It was outside the search area. Silence has been converted into evidence.

Biodiversity net gain: the missing document

We have searched the entire application. There is no biodiversity net gain assessment, no metric calculation, no baseline value, no percentage and no Biodiversity Gain Plan. The covering letter lists all twenty-five submitted documents and there is no such document on the list.

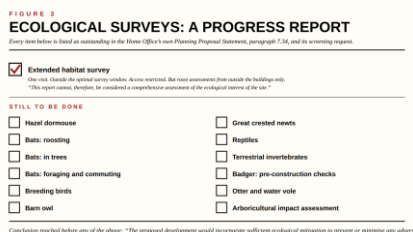
The site is 10.22 hectares, so the small-sites exemption does not apply. The use is expected to last at least ten years, so the five-year temporary exemption does not apply. The Planning Proposal Statement's position, at paragraph 7.34, is that the proposal is **"capable of complying"** with biodiversity policy. Not complying. Capable of it.

We mention it not because beavers are the issue, but because this is the level of care being taken with the document that decides which species get looked for at all.

ENVIRONMENT DESK — THE OUTSTANDING LIST

One survey done. Eleven to go.

The complete state of the ecological evidence supporting an application the Government says is too urgent to wait.



Compiled from the Planning Proposal Statement paragraph 7.34, the EIA screening request, and the Preliminary Ecological Appraisal's own conclusions.

[FACTUAL] Two of the outstanding items concern European Protected Species: bats and great crested newts. Damaging or destroying the breeding site or resting place of a European Protected Species is, in Natural England's own words in this very application pack, **"an absolute offence"**.

Three of the twelve are bat surveys, and the preliminary roost assessments that have been done were carried out from **outside** the buildings, because access was restricted. The buildings are the ones proposed for demolition.

Great crested newt and reptile surveys have defined seasons. So do breeding bird surveys and bat activity surveys. If a season is missed, the survey waits a year. The Preliminary Ecological Appraisal states that its own findings **"will remain valid for a period of eighteen months from the date of the survey"**, which expires in the autumn of 2027.

[SATIRE] An emergency so pressing that it cannot wait for a consultation period, but which the newts can hold up until next spring.

And one more thing that has not been done at all

There is no biodiversity net gain assessment in this application. No metric, no baseline value, no percentage, no Biodiversity Gain Plan. The covering letter lists every document submitted and there is no such document on the list. The site is 10.22 hectares, so the small-sites exemption does not apply, and the use is expected to last at least ten

years, so the five-year temporary exemption does not apply either.

SCOOP — THE LETTER THAT SAYS RE-CONSULT

"A response has not yet been received."

On 3 July 2026 the Home Office's consultant told the Secretary of State that Natural England had not replied. Natural England had replied on 4 June. On 6 July the Home Office submitted that reply with its planning application.

[FACTUAL] This is the cleanest single point in the entire application and it requires no interpretation whatever.

4 June 2026. Natural England writes to the Home Office under its Discretionary Advice Service. Under the heading **"Further Information Required"**, it says: **"From the information provided the proposal could have potential significant effects on Arncott Bridge Site of Special Scientific Interest (SSSI)."** It says Natural England **"will need to be consulted with further information regarding hydrological impact pathways ... in order to determine the significance of these impacts and the scope for mitigation."** It ends: **"Please re-consult Natural England once this information has been obtained."**

3 July 2026. The EIA Screening Direction Request, submitted to the Secretary of State, states at page 27: **"Natural England have been contacted however, a response has not yet been received."**

6 July 2026. The application is submitted. Its covering letter lists, among the enclosures, “*Natural England advice*”. It is the letter of 4 June.

16 July 2026. The Home Office emails Natural England: “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 sites Surface water could enter the SSSI.”

That is the applicant conceding, three months after its own consultant had concluded from a public web map that there was “*no hydrological pathway*”, that it does not know, and that the honest assumption is that the water does reach the protected site.

The advice Natural England was actually given

Natural England’s later letter, of 23 July 2026, is candid about what it had to work with:

“As Natural England has not had sight of the drainage details themselves, our advice at this stage is based on the email of 16 July 2026.”

— Natural England to Home Office, 23 July 2026

That letter, incidentally, is headed with the wrong site reference: “Your Ref: **MOD008**”. This is MOD015. And it reaches the public under the filename

MOD_Bicester_Drainage_Design_redacted.pdf, which it is not. It is a

two-page letter from Natural England.

On the strength of that email, Natural England noted two things the Home Office had told it: that “*the project will be designed to ensure greenfield runoff rates*”, and that “*it is anticipated that foul water will be connected to mains*”. Natural England added that if foul water were not connected to mains, “*Natural England would also need to be consulted on the alternative means.*”

Both of those representations were, on the face of the Home Office’s own submitted documents, already out of date by a month.

The Drainage Design Statement of June 2026 says Phase 1, the accommodation area, “*cannot be restricted to greenfield rates*” and “*will continue to drain in its existing manner*”.

The same document says Thames Water was never contacted and that **Approach 3**, a new on-site sewage works discharging to a watercourse, was the option selected.

[FACTUAL] This was paid-for advice. Natural England’s letters state that they are issued under the “*Discretionary Advice Service (Charged Advice)*”, under a “*Quotation and Agreement dated 18 May 2026*”, and that the advice “*does not constitute a statutory response or decision*” and “*is therefore not binding in any way*”, and that “*its quality and detail is dependent upon the quality and depth of the information which has been provided.*”

The redaction that tells you the most

Natural England’s letter of 4 June 2026 contains the following sentence, followed by a colon, followed by nothing at all:

“I note that the proposed site includes as presented, has the potential to affect species protected under European or UK legislation. Please see Annex 1 for information regarding licensing for the following European Protected Species:”

— Natural England, 4 June 2026, as published in the application pack

The Government’s own nature conservation adviser identified European Protected Species on this site. The list of which ones has been removed from the published document. The residents of Piddington are entitled to know what is living on the land next to their village, and are currently not permitted to.

And the three documents nobody can read

The Secretary of State’s written statement records that Natural England “*clarified on 11 August 2026*” and “*responded on 13 August 2026 that they are content for the proposed development to move forward*”. Those three communications, of 23 July, 11 August and 13 August, are what moved the position from “*could have potential significant effects*” to “*content*”. **None of the three is in the published application pack.** The only Natural England letter the public can read is the one that says the opposite. PPC has requested them.

DOWN THE DRAIN, PART II

Sleep forty-five metres from the sewage works... no thanks!

The standard odour boundary for a wastewater treatment works is 250 metres. The Home Office proposes to put bedrooms at 45. In a secondary school you can smell their toilets from 45 metres away. No odour assessment has been carried out to prove this is safe. Why, with such a large site, are they proposing this?

[FACTUAL] The Drainage Design Statement of June 2026 is refreshingly honest, which is why it is the most damaging document in the pack. Verbatim:

- “A standard odour boundary from a WwTW is ~250m from the source of odour.”
- “An odour impact assessment will need to be undertaken.”
- “The residential and welfare units are intended to be approximately 45 m from the WwTW for future phases.”

It also notes that Launton FC’s sports ground is approximately 130 metres from the proposed sewage works, and that “it will be necessary to ensure the receptors at this facility are not impacted by odour or noise.”



Nobody has asked Thames Water

“It has not been possible to liaise with the statutory undertaker within the RIBA 2 design programme.”

— Drainage Design Statement, section 9.2

The only Thames Water material in the entire application is a routine property search: a map of pipes, carrying the words “No responsibility can be accepted for any error or omission in the replies”, and an offer to arrange a full flow and pressure test “for a fee”. There is no evidence that fee was paid.

So, in the absence of any information: “Whilst Approach 1 is the preferred, Approach 3 was selected for the RIBA 2 approach as there is not enough information to confirm the feasibility of the other approaches.” Approach 3 is a brand-new sewage treatment works on site, discharging to a watercourse. And:

“At present, there are no apparent watercourses that seem suitable for discharge within the curtilage of the site at MOD015.”

— Drainage Design Statement, section 9.5

The three options the document says it considered for solving that problem appear as three empty bullet points.

In the meantime: tankering. The initial phase is to be served by a cesspool with the waste taken away by lorry. Phase 1 is 408 people at 140 litres a head per day, which is roughly two tanker loads a day, every day, down the B4011, to a licensed facility that has not been identified.

No document in the application assesses those movements.

Modelled as holidaymakers

“SUs are assumed to be considered as ‘Chalet Users’ from British Water Flows and Loads 4.” The sewage of men held for up to ninety days in a former ammunition depot has been calculated using the design category for people on holiday in a chalet. Emergency storage provided at peak flow, for a site of nearly 1,400 people: **twenty minutes**, or 8.1 cubic metres. With everyone eating from the same canteen, let’s hope there aren’t any outbreaks of E. coli.

DOWN THE DRAIN, PART II — THE LOWEST POINT ON THE SITE

It floods. The pumps are broken. Nobody can find the pumps.

Everything below is from the applicant’s own drainage, utilities and flood risk documents, all dated 2026.

Phase 1: the part with the bedrooms in it

Read these together. All from the applicant’s own documents.

The accommodation goes on the northern hardstanding. That hardstanding is “the lowest part of the site”. The MOD site team confirmed it “is prone to frequent surface water flooding”. The cause is two pumps that have failed, and “it was not possible to verify the existence, location, or specification of these pumps during the visit”. The gullies and drains are blocked, “which would likely result in flooding regardless of pump status”. On a dry, clear day with no rainfall,

“evidence of localised surface water flooding and ponding was observed in several areas”. We know this too because we have been provided photographs from the adjoining farm showing the proposed site entirely underwater.



And the proposed drainage strategy for that area, in full: **“there is no suitable area for attenuation storage within Phase 1 ... flows from this area cannot be restricted to greenfield rates, and it is proposed that Phase 1 will continue to drain in its existing manner using the current collection, conveyance and outfall arrangements. It should be noted that the exact position, line, and level of these is currently unknown ... It is assumed that the existing drainage features are able to be brought up to a serviceable condition having not been maintained for a considerable length of time.”**

[SATIRE] To summarise: it floods, the pumps are broken, nobody can find the pumps, the drains are blocked, nobody knows where the pipes go, and the plan is to change nothing and assume it will be fine. We would call this a strategy of hope, except that hope usually involves at least knowing where the pipes are.

[FACTUAL] The Flood Risk Assessment assesses the site’s vulnerability classification as **“Less Vulnerable”**, which is the classification of a **military storage depot**. It notes only that **“it is possible that any future development may be at a higher vulnerability”**. Residential accommodation is **“More Vulnerable”**. On that basis it concludes **“an exception test would not be required”**. It refers throughout to **“any future development”**, because it was written for a site, not for this proposal.

It also downgrades the surface water flood risk from **“high”** to **“moderate”** on the strength of a private drainage network that it has never surveyed, that the Utilities report calls **“largely non-operational”** with **“blocked assets”**, and that the Flood Risk Assessment itself then recommends should be CCTV surveyed to find out what condition it is in.

And, on the sequential test, this: **“Where possible, any new development should be located outside of any flood extents to avoid triggering the need for a Sequential Test.”** The stated purpose is not safety. It is avoiding a test.

The receiving watercourse, the River Ray, was classified in 2022 as having **“Bad Ecological Status”**.

And the clean water, while we are here

The Drainage Design Statement assumes a demand of **140 litres per person per day**. For 1,256 residents and 130 staff that is roughly **194 cubic metres a day**, every day, in a region the Environment Agency

classifies as seriously water stressed.

The Utilities and Infrastructure Assessment records that the site’s water network is private, that a site inspection **“suggests that the site network is of limited capacity relative to any concentrated development”**, and that the design is proceeding **“on the assumption”** that potable water will be supplemented by storage tanks, **“subject to available capacity”**. The only Thames Water material in the application is a routine map of pipes. There is no flow and pressure test, and no capacity confirmation for clean water any more than for foul.

EXCLUSIVE — THE ORDNANCE

A bomb report for 3,510 men who are not coming

The unexploded ordnance risk assessment for Site A assesses a development 2.8 times larger than the one applied for. It says so twice. Nobody noticed.

[FACTUAL] The Preliminary UXO Risk Assessment, dated 31 March 2026, states in its executive summary and again at section 3.2:

“The proposed scheme consists of the work is understood to construction of accommodation for 3,510 service users.”

— Preliminary UXO Risk Assessment, page 1 and page 5 (grammar as in the original)

Every other document in the application says 1,256. The sentence is not grammatical, which

tells you it was pasted from a template at speed and never read.

It gets better. This is a Second World War **Central Ordnance Depot**. The same report records: “Various types of weapons were stored at the AOI, which included large quantities of 20mm cannons, 40mm guns, 25pdr guns, 95mm guns and large quantities of barrels for 6pdr and 17pdr anti-tank guns.”

And then, in the very next sentence:

“Research has not specifically identified any munitions-type storage at the AOI.”

— Preliminary UXO Risk Assessment, section 3.1

[SATIRE] They found the guns. They could not find the ammunition. This is, we accept, the traditional problem with ammunition.

[FACTUAL] The report identifies four separate elevated UXO risk factors: defensive action, explosives storage and processing, potential burial sites, and disposal sites. The justification for three of the four is the same sentence, pasted three times: “Taking into account that the AOI has been in military occupation since WWII, the potential presence of UXO associated with this source cannot be completely discounted without further detailed research.”

That further detailed research was not carried out. There was no site visit, no magnetometer survey, no clearance and no explosive ordnance disposal engineer. The proposed mitigation, in full, is a training course and a plan for what to do if somebody finds a bomb.

The report also carries, still sitting in its delivered executive summary, an instruction to its own author:

“Standards/best practice. State that if not a DIO project, DIO TSOR’s/standards have been applied”

— Preliminary UXO Risk Assessment, page 1, executive summary

The Secretary of State’s written statement summarises all of the above as: “The assessment concluded that the potential risk of encountering UXO will be ‘low’.”

Nobody has dug a hole

Nor is the ordnance the only thing nobody has looked for. The Drainage Design Statement states it plainly:

“No intrusive ground investigation has been undertaken at this stage. The ground conditions described above are based on desk-based information only and remain unverified.”

— Drainage Design Statement, section 3.1

The entire geotechnical and contamination understanding of a 1940s ammunition depot rests on **two borehole records from 300 metres away**, and a commercial environmental data search dated 2 April 2026.

An asbestos demolition survey in April 2026 “identified the presence of ACM”. Contamination sampling is deferred to a pre-commencement condition. And the Geo-environmental Assessment contains this, which nobody has explained:

“The site comprises four areas plus an area which is not under consideration for future use **due to health and safety concerns.**”

— Preliminary Geo-environmental and Geotechnical Assessment, section 1.3

Two documents, one site, opposite facts

The UXO specialist: research “has not specifically identified any munitions-type storage at the AOI.” The drainage engineer, recommending where to take soil samples: sample “the area where **munitions were handled and stored.**” Both documents were produced in 2026 for the same application. And the Home Office’s written statement asserts that its 2026 report “supersedes the 2010 report” on land quality; the 2026 report does not cite the 2010 report anywhere, and contains no reference to radiological contamination or to building A33.

FIRE, POWER AND WATER — THE MISSING CHAPTERS

A fire strategy with no exits, no water and no fire brigade

[FACTUAL] The Fire Safety Strategy for a facility housing 1,256 people is a RIBA Stage 2 document dated May 2026. Its contents page lists sections on Travel Distances, Minimum Number of Exits, Evacuation Strategy, Fire Vehicle Access Routes and Water Supplies. In the document as published, those sections contain no content.

There is no occupancy figure. No travel distances. No number of exits. No firefighting water supply. No hydrants. Neither the nearest fire station nor response times are mentioned. Oxfordshire Fire and

Rescue Service does not appear to have been consulted.

What it does say, repeatedly, is that it does not have the information:

- “More information is required to give specific requirements on the category.”
- “To give specific structural requirements, more information is necessary.”
- “Reaction to fire classification is to be determined when specific GA plans and building heights are provided.”
- “In order to undertake these calculations GA plans and elevations of each building will be required.”

In May 2026 the fire engineer did not have general arrangement plans or building heights. The application went in six weeks later.

The one operational problem the fire strategy does identify, it cannot solve:

*“Provision of easy and speedy entry points to the site ... for fire-fighters and their equipment, as the site has a secure fence around its perimeter **information on how they will gain access through this will be needed.**”*

— Fire Safety Strategy, section 9.1

The Home Office’s planning statement nonetheless concludes, at paragraph 7.75, that “the proposals are in accordance with the Building Regulations 2010 (Part B)”, having conceded at 7.74 that “detailed escape distances, structural fire resistance and space separation” remain outstanding.

It also cites two editions of the fire alarm standard on facing pages, misnames BS 9991 as BS 9999 in the sentence defining it, and writes escape provisions for “flats or maisonettes”.

Power: 2.16 megawatts of diesel

[FACTUAL] The Utilities and Infrastructure Assessment reports that the electrical network’s “condition, capacity and configuration ... are currently unknown” and that “the capacity of the primary intake ... has not been verified at this stage”. Its conclusion:

“Due to the current uncertainties regarding available power within the network, the current proposal assumes that the existing electrical infrastructure cannot be relied upon, and therefore temporary and/or permanent generator provision shall be incorporated.”

— Utilities and Infrastructure Assessment, section 4.2

Estimated maximum demand: **2.16 MVA**. There is no gas on site, so heating, hot water and cooking for 1,256 people are all electrical. There is no distribution network operator load enquiry or connection offer anywhere in the application. The only electricity correspondence submitted is an automated asset-protection response from National Grid, in reply to an enquiry dated 21 November 2025 which declared the activity type as “Commercial/industrial” and the work start date as the following day, and which states that it “does not constitute any formal agreement or consent”.

National Grid’s advice, reproduced in the same appendix, is that “no permanent structures are built directly beneath our overhead lines”. The design response, in the applicant’s own words: “locating parking under the overhead lines”.

The sentence the planning statement improved

The Utilities and Infrastructure Assessment says: “**whilst existing capacities within the utility networks are yet to be determined**, provisions have been made in the design for temporary solutions, **until such time that full requirements can be met.**”

The Planning Proposal Statement translates that, for the decision-maker, at paragraph 7.77, as: the provision of short-term infrastructure “**will be immediately available to meet the full requirements of the proposed development.**” Readers may form their own view about whether that is the same sentence.

Air quality: no receptors, no numbers, no assessment

The Air Quality Screening Technical Note screens the development out because its traffic falls below a threshold of 500 light and 100 heavy vehicles a day. It never states what the figure is, and the Transport Assessment’s trip generation tables are redacted. The threshold cannot be checked by anybody.

Its executive summary says the assessment involved “identifying sensitive receptors”. Its section 4.3 says: “**Therefore, no sensitive receptors have been selected.**” Same document, same author, same issue.

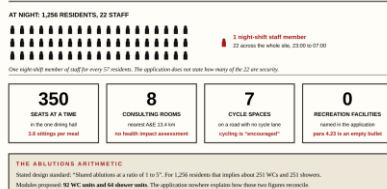
Its reasoning is that the development is “not anticipated to lead to an increase in vehicle emissions **due to the nature of the**

OPERATIONS DESK — THE NUMBERS NOBODY ADDS UP

Fifty-seven residents per member of night staff

The application tells you almost nothing about what living here would be like (it does heavily redact discussions around suicide, health and safety, and processing if there was a death on site). What it does tell you, it tells you in numbers, and the numbers do not work.

FIGURE 5
LIFE ON SITE, BY THE APPLICANT'S OWN NUMBERS
All figures from the Secretary of State's written statement of 26 August 2026 and the Planning Proposal Statement.



All figures from the Secretary of State's written statement of 26 August 2026 and the Planning Proposal Statement. The ratios are ours.

[FACTUAL] The site will employ “approximately 130 staff... including 108 staff for day-shift and 22 staff for night-shift”. How many of those 22 are security is not stated anywhere. The Equality Impact Assessment says only: “The Service provider will determine the exact number of security staff needed.”

development”: a development of 1,256 residents, 130 shift staff, 147 parking spaces, coach arrivals, lorry servicing and a fleet of minibuses.



The Operational Management Plan in the application is expressly an **outline**. The real one, paragraph 4.1 explains, “will be prepared for the Site, following the appointment of the Service Provider(s)”. The service provider has not been appointed. The Transport Assessment describes it as “a specialist accommodation provider (yet to be appointed)”.

So the document that will actually govern how 1,256 people live on this land does not exist, will be written by a company nobody has chosen yet, and will be written after permission is granted.

What the outline does say

“Clothing will not be supplied to asylum claimants whilst at the accommodation. Service users will be made aware of various voluntary sector support in the vicinity of the accommodation.” The vicinity, per paragraphs 2.5 and 2.10 of the same document, is inaccessible on foot and has “very limited facilities”.

“Private rooms will be available at the Site to conduct remote asylum interviews by caseworkers from the Home Office. No individual asylum casework surgeries will be offered.”

The word “asbestos” does not appear in it at all, though the warehouses to be demolished contain it.

“Email correspondence from the Home Office will be printed by the Service Provider and distributed to service users within 24 hours of receipt or as requested by the sender of the email. The email is printed in the language it is received in.”

On recreation, paragraph 4.23 reads in full: “The following recreational facilities will be provided:” followed by a single bullet point with nothing after it. The Equality Impact Assessment’s contribution is one sentence: “Onsite recreational facilities will be provided.”

There is a gym, but only in the Secretary of State’s written statement, which mentions “an existing warehouse to be converted to a gym facility”. The Planning Proposal Statement never mentions a gym at all. We suppose it’s covered by redaction somewhere, hiding it from the public.

[SATIRE] Diary looks forward to the printed email, in a language the recipient may not read, delivered by hand, on a site with 350 dining seats for 1,256 people, in a country where the Government has calculated the sewage on the assumption everybody is on holiday.

EQUALITY DESK — SCHEDULE 18, PARAGRAPH 2

“Certain *protected* characteristics won’t apply”

A sentence about the Equality Act 2010, in a Secretary of State’s written statement of reasons, in 2026.

[FACTUAL] The Equality Impact Assessment was signed off on **28 May 2026**, five and a half weeks before the application, and describes a site of **“5 hectares of the larger site”**. Every other document says 10.22 hectares. It was never updated.

It is also, on its own analysis, unlawful unless justified. Twice, in bold, in the applicant’s own words:

*“The operation, as currently assessed, at Bicester is considered to be **directly discriminatory in relation to age.**”*

*“The operation, as currently assessed, at Bicester is considered to be **directly discriminatory in relation to sex.**”*

— Equality Impact Assessment, 28 May 2026

The age discrimination is said to be justified under section 13(2) as a proportionate means of achieving a legitimate aim. The sex discrimination is said to be permitted by the communal accommodation exception at Schedule 23(3), and, separately, by Schedule 3. The Home Office also relies on paragraph 2 of Schedule 18, which disapplies part of the public sector equality duty in

relation to immigration and nationality functions.

None of that is unusual in itself. What is unusual is what the assessment then does not do.

Disability: conceded, then dismissed

The assessment accepts that “*the Site and rooms are **not adapted for those with particular accessibility needs***” and that this “*could prevent service users making full use of the Site’s amenities and facilities*”. It then concludes, in bold, that the operation “*is not considered to be directly discriminatory in relation to disability*”.

The Transport Assessment’s solution for a disabled resident is relocation: if needs “*cannot be met on site*”, the service user “*will be moved to alternative accommodation*”. The same document claims the development is “*fully inclusive and meets the needs of all **staff and visitors***”. Residents are not in that sentence.

The neighbours who are not in it

One hundred and fifty metres south of the site is **Hillside Park**, a twelve-pitch (last time we counted, there were around 20 caravans.) Gypsy and Traveller site which the Secretary of State’s own written statement records as “*established and occupied*”. Romany and Irish Traveller ethnicity is a protected characteristic under the race provisions of the Equality Act.

The Equality Impact Assessment does not mention it. It does not mention HMP Bullingdon either. It contains no assessment of the effect of the proposal on the protected characteristics of the

receiving population at all. Its treatment of fostering good relations is a communications exercise: a factsheet on the Home Office website.

The section that says it should not be published

“The section below must be completed. It contains sensitive information and is for internal use only. This section should not be published. Please redact the section below if you intend to publish your EIA outside of the Department.”

— Equality Impact Assessment, section 9

It was published, unredacted, in the planning application pack. The document’s own publication status reads “[Not decided yet]” and neither consent box is ticked. It is also the document that anticipates four categories of protest, including “*pro-immigration groups who have concerns about the perceived conditions on the site, or that the site is being operated as a detention centre*”.

And the mitigation that “may be considered”

The shuttle bus carries the entire transport and highway safety case. The Planning Proposal Statement says “*shuttle buses/minibuses **will be available***”. The Secretary of State’s statement says residents will be “*strongly encouraged*” to use it. The Equality Impact Assessment says: “*Shuttle buses from the Site to nearby urban centres **may be considered** to enable the residents to utilise community facilities such as libraries, shops and public spaces.*”

NEED, ALTERNATIVES AND VALUE FOR MONEY — GROUND 12

1.2 per cent of the problem, and not one alternative site

The document that explains why this is nationally important carries no date, no author and no signature, and considers no alternative to this field.

[FACTUAL] The Statement on National Importance sets out the case. As at 31 December 2025, it records, “107,000 individuals were in receipt of asylum support, including 31,000 (29%) in hotels”.

Site A would provide 1,256 bedspaces. **That is 1.2 per cent of the people on asylum support, and 4.1 per cent of those in hotels.** The arithmetic is ours; the figures are the applicant’s.

The document contains a section headed “*Alternatives Considered and Need for Urgent Determination: Why Urgent Crown (not non-urgent Crown or Class Q) is necessary for Bicester*”. Every alternative it considers is a **planning procedure**: the ordinary Crown route, a Special Development Order, permitted development under Class Q. There is no assessment of any alternative site anywhere in the document, or anywhere in the application.

For that, the Planning Proposal Statement falls back on 2003. Paragraph 6.9: “**alternative site analysis was not considered necessary in those circumstances**”. Paragraph 2.16 records that in 2003 “*it was not necessary to carry out a sequential test or consider alternative options*

for the location of the proposed development”.

A finding made about a different scheme, for 750 people, twenty-three years ago, is doing the work of an alternatives assessment in 2026.

What the urgency actually is

*“The ‘non-urgent’ Crown Development route is understood to take approximately **12 weeks** to determine applications and **16 weeks** for EIA applications.”*

*“Current programme assumptions are to submit the Urgent Crown application by July, **secure Urgent Crown approval by late August 2026** to enable required works to be completed.”*

— *Statement on National Importance, undated*

The application was submitted on 6 July 2026. Twelve weeks from then is the end of September. The entire case for removing the ordinary consultation and scrutiny that applies to a development of this size is, on the applicant’s own account, the difference between late August and late September.

And the urgency is self-created. The programme is the Home Office’s own; nothing external fixes late August. The same document notes, in parentheses, that this is not the first attempt: the route was chosen “*as reflected by **previous Home Office experience where an SDO approach was withdrawn and replaced by an Urgent Crown submission***”.

Temporary, until you read the next paragraph

The application is for a temporary ten-year use. The document justifying it says something else entirely: “**Over time however, it is intended that the site will subsequently be expanded for use as a long-term asylum accommodation solution**”, and that permitted development would not provide “*the necessary certainty for **permanent infrastructure solutions***”.

The screening direction goes further: “*there are **no definitive plans for the decommissioning phase***”, and “*it is assumed that the Proposed Development operates **permanently** as a worst case scenario*”.

[SATIRE] Three durations, one field: ten years on the form, permanent in the screening, and long-term and expanded in the document explaining the hurry.

The claim that deserves a source

The same statement asserts: “It is also understood that hotels represent a ‘pull’ factor for asylum seekers to come to the UK even after passing through other safe countries: **intelligence suggests that the prospect of a paid-for hotel bed is used to lure asylum seekers into small boats**.” The footnote points to a Government policy statement of November 2025. No underlying evidence is cited, and none is in the application. This proposition is doing part of the work of establishing national importance, and it is unevidenced on the face of the document.

NOISE, HEALTH AND THE NEIGHBOURS — THE HOUSING ESTATE THAT IS NOT THERE

A noise report about a housing estate

The Noise Impact Assessment for a secure 1,256-bed institution recommends garden fences.

[FACTUAL] The Noise Impact Assessment has not been adapted from its template. In the consultant's own words it recommends that *"the proposed dwellings are located as far east from B4011 as practicable"*, and that external amenity areas be shielded *"with solid 1.8m high garden fences to reduce noise as low as practicable"*.

There are no dwellings and there are no gardens. There are 984 modular units, two metres four by six metres, double stacked, behind an anti-climb fence.

On the numbers, the report records night-time levels across the site of **"35 – 61 dB LAeq,8hr"** between 23:00 and 07:00, and derives an external night-time target of **43 dB**. Its response to an eighteen-decibel exceedance is that *"a small section of the site would exceed these targets, and therefore consideration may need to be given to noise insulation"*. No area is quantified. No units are counted. No mitigation is committed.

What it does not assess at all

The report assesses only noise arriving at the site from the B4011. It contains **no assessment whatever of noise generated by the development affecting anybody outside it**: not the 1,256 residents,

not coach arrivals, not the shuttle fleet, not lorry deliveries, not the diesel generators the utilities report says will be needed, not the demolition of asbestos-bearing warehouses.

The words *"Piddington"*, *"Bullington"* and *"shuttle"* do not appear in it anywhere. *"Construction noise"* appears once, in the glossary, as a definition.

Health: no assessment, and a long way to A&E

Nearest accident and emergency: John Radcliffe Hospital, **13.4 kilometres**. Nearest non-emergency secondary care: Bicester Community Hospital, **6.4 kilometres**. Nearest GP practices: **4.5 and 4.9 kilometres**, both described as *"under capacity"*. On site: **eight consulting rooms** and **64 medical isolation bedspaces**.

There is no Health Impact Assessment anywhere in this application. The Secretary of State's own statement describes the receiving ward twice, in the same document, as both *"more deprived than 71% of neighbourhoods in England"* and *"ranked in the second most deprived percentile"*. Those two statements cannot both be right, and nobody appears to have noticed.

The neighbours the Transport Assessment could not find

Transport Assessment, paragraph 6.3.2: *"A search of the CDC's planning portal has confirmed that there are no significant highway schemes or committed developments near the site which could have an impact on local traffic conditions therefore, none have been considered in this assessment."*

Transport Assessment, paragraph 1.5.1, in full: *"There have been no recent (five years) relevant planning applications within the application area."*

Three pages earlier, the same document notes a traveller site with permission for six units and an undetermined 2024 application for twelve more. The Secretary of State's written statement records that the twelve-pitch site is *"established and occupied"*, and that construction at HMP Bullington *"commenced in September 2024"*. Neither appears in the traffic model. The prison's only role in the Transport Assessment is to supply the bus stops by which the site's public transport accessibility is assessed.

"The sole 'community' asset located on or around the site is the nearby sports ground, however a Gypsy and Traveller site to the south of the site is established and currently in operation."

— Secretary of State's written statement, 26 August 2026

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HERITAGE DESK — OXFORDSHIRE-ON-SEA

"The South Coast is a particularly rich area for studying the medieval period"

The Archaeological and Heritage Assessment for Piddington, Oxfordshire, seventy miles from the sea.

[FACTUAL] That is a verbatim quotation from the medieval section of the Home Office's Archaeological and Heritage Desk-Based Assessment. The sentence continues: "... as the region's location between London and the Continent led to a number of especially impressive buildings, and the area has always been important for overseas trade, coastal trading, and cross-channel shipping routes." The next sentence adds: "By the Norman Conquest, and in keeping with other regions of southern England, the geography of the South-East had undergone significant change."

The Mesolithic section, not to be outdone, explains that "the visibility of material may have been impacted by coastal and sea-level changes". "Doomsday Book" is misspelt in the same paragraph.

The Roman town three kilometres away is **Alchester**. In four places the report calls it **Alcester**, which is a different town, in Warwickshire: "the road west of Alcester", "between Alcester and Verulamium", "Alcester's hinterland", and "the hinterland of Bicester and Alcester".

The road outside is the B4011. The report calls it the **A4011**, three

times, and locates the site "at the intersection between Widnell Lane and the A4011 Thame Road".

The site area is 10.22 hectares. The report says, twice, "The site is approximately 50 hectares". Its findings about "the application site" are therefore findings about an area roughly five times larger.

The walkover happened on 23 February 2026, by "a suitably experienced archaeologist", or on 11 March 2026, by "a Heritage Consultant", depending which section you read. Section 9, the section reporting the walkover, records nothing that was observed. It records the weather.

High potential. No investigation. A watching brief.

The report's own conclusions: "**high potential**" for Roman remains, "**moderate potential**" for early medieval, "**high potential**" for medieval to post-medieval, and overall "the archaeological potential of the Site is moderate to high". It also mentions, once, in the impacts chapter, with no reference and no entry in its own baseline, "the large quantity of Samian Ware recovered during the construction of one of the warehouses on site in the early 1940s".

No field evaluation, geophysical survey or trial trenching has been carried out anywhere on this site. The EIA screening request says so: "No site investigations are currently planned ... this will be addressed in greater detail in the Heritage Desk-Based Assessment." The Heritage Desk-Based Assessment then addresses it by recommending a watching brief.

And that conclusion rests on an assumption which the rest of the application contradicts:

“Assuming that Area 1 is the focus for the proposed works and that the current hardstanding remains in-situ, there will be little or no impact on any underlying archaeological remains.”

— Archaeological and Heritage Desk-Based Assessment, section 11.2

The application proposes demolition, vegetation clearance, new reinforced concrete foundations in Phases 2 and 3, an excavated attenuation basin of 860 cubic metres, a pumping station and a 3,105 square metre wastewater treatment plant.

[FACTUAL] The same report describes MOD Bicester as **“the outstanding example in the UK of a bulk storage depot built during the Second World War”**, and then never assesses the demolition of any part of it. There is no significance assessment of the Nissen huts, the Romney huts, the wartime warehouses or the Bicester Military Railway. The Drainage Design Statement records that **“the proposed masterplan extends across these track alignments and therefore consultation with the Historic Railways Estate will be required”**. The heritage report does not mention the Historic Railways Estate at all.

Nor does the Landscape and Visual Statement contain any assessment of external lighting, sky glow, light spill, CCTV columns, security fencing or night-time visual effect. Its policy appendix reproduces five Cherwell policies and omits the one containing the light pollution requirement. Its zone of theoretical

visibility is modelled on a plain 6-metre box, with no fencing, no lighting columns, no CCTV towers and no sewage works in the model.

Its entire mitigation strategy, at section 1.3.1, is that the buildings will be inside the existing built form. Everything else is a list of things for somebody else to “consider” later. Its conclusion is that the development is **“unlikely to bring about highly perceptible landscape and visual change”**, and one of its own photographic plates concedes: **“The Site is visible within the panoramic view available.”**

Diary of a heritage consultant

Tuesday. Walked the site. Weather bright and sunny, excellent visibility. Recorded this fact. Recorded nothing else. Thursday, or possibly a fortnight ago, unclear. Wrote up medieval Oxfordshire with particular reference to cross-channel shipping. Friday. Concluded no impact, assuming the concrete stays where it is. Note to self: check whether the concrete stays where it is.

DESIGN DESK — THE PARAMETERS PLAN

The parameters plan with no parameters

Three drawings are before the Secretary of State for approval. One of them is a site location plan. One is a demolition plan with five labels on it. The third is this.

[FACTUAL] Drawing BIC-DR-AR-100107, the Site Parameters Plan, is one of only three drawings submitted for approval. The full extractable content of that file is the

Ordnance Survey’s own base map labels:

No parameter. No dimension. No height. No parcel. No fence line. No access point. No parking number. No key.

The Existing Site Plan carries exactly one piece of added information: **“LOWEST EXITING SITE LEVEL DATUM POINT 62.29”**. The misspelling is theirs. The heritage report says the lowest point on the site is 64 metres above ordnance datum, so the drawing and the heritage assessment cannot both be right.

The Demolition Plan carries five labels: **“Existing Nissen Huts”** four times, and **“Existing Nissen Hut”** once. The Secretary of State’s written statement says **“a total of five existing Nissen Huts are proposed to be demolished”**. The Drainage Design Statement says the site contains **24** Nissen and Romney sheds and that Phases 2 and 3 are built on their slabs. The Planning Proposal Statement says the buildings to be demolished total **15,950 square metres**, which across five Nissen huts would make each one roughly ten metres by three hundred.

The covering letter and the Planning Proposal Statement both describe the parameters plan as **“BIC-DR-AR-100107-P01 Rev. 2”**. The file supplied is P01. Only that drawing carries the phrase. Either the drawing supplied is not the drawing applied for, or the revision code means nothing.

What is not before the decision-maker

No site layout plan. No floor plans. No elevations. No sections. No materials schedule. No landscape or planting plan. No external lighting layout. No boundary treatment or fencing plan. No CCTV or security infrastructure plan. No drainage layout. No details of the wastewater treatment plant. No levels or earthworks plan.

The Application Form's materials table, covering walls, roof, windows, doors, boundary treatments, hardstanding and lighting, appears to name no material at all. Its vehicle parking table appears to contain no numbers, although the screening direction gives 147 car spaces and eight cycle spaces. Its employment table appears to contain no figures, although roughly 130 staff are proposed.

The form does, however, record the use class. It is **C2A: Secure Residential Institutions**, the class covering prisons and detention centres, on an application which insists throughout that the site is non-detained and that residents *"will be free to come and go"*.

Nine things deferred to a condition

The arboricultural impact assessment. The lighting scheme. The combined heat and power feasibility study. The renewable energy feasibility study. The contamination investigation. The long-term power supply. The long-term foul water solution. The long-term surface water solution. And the entire drainage strategy. The Operational Management Plan is expressly an outline only; the real one will be prepared *"following the appointment of the Service*

Provider(s)", who has not been appointed. The Security Management Plan is said at paragraph 7.56 to have been prepared. It is not in the pack.

The permitted development rights being requested

At paragraph 5.85 the Home Office asks that the permission retain, among others, **"Part 1 (development within the curtilage of a dwellinghouse)"**, alongside Crown emergency rights, Crown pandemic rights, national security fencing rights, national security CCTV rights and national security communications rights.

There are no dwellinghouses. The reason given, at 5.88, is *"flexibility in the future to undertake small scale development projects not foreseen at the time of the submission"*.

OPERATIONS DESK — THE TOWN NOBODY PLANNED

A settlement of 1,256 built in a field, and nobody has drawn the streets

The application would place, on ten hectares of a former ordnance depot, more people than live in Piddington, Arncott and Launton combined. It calls itself a change of use. Read in full, it is the founding of a small town, delivered in three phases, staffed at night by twenty-two people, and served by no pavement, no gas main and no public sewer.

Three phases, and the first one lands in the wettest corner

[FACTUAL] The scheme is built in three phases. Phase 1 delivers 408

bedspaces. Phase 2 adds 216. Phase 3 adds 632. The total is 1,256. Of the 408 bedspaces in Phase 1, 384 are standard and 24 are medical isolation units. That last figure is worth pausing on. The application provides, from day one, two dozen rooms designed to isolate the sick, which tells you the density and the risk the operator already expects.

[FACTUAL] Phase 1 is proposed on the existing northernmost hardstanding. The applicant's own Drainage Design Statement describes that hardstanding as the lowest part of the site, with no suitable area for attenuation storage, draining in its existing manner. So the first 408 residents are placed on the lowest, wettest ground on the site, without a flood evacuation plan, and without the Environment Agency or the lead local flood authority having been consulted. The bedrooms come first. The drainage comes later, if at all.

The facilities, in full

[FACTUAL] The built scheme is large. There are 14,471 square metres of new modular accommodation blocks, and 17,935 square metres of new floorspace in total. It includes communal kitchens serving three meals a day, laundries, a medical centre with eight consulting rooms and the medical isolation units already mentioned, welfare and recreation buildings, staff and security accommodation, a generator compound, and a wastewater treatment works of 3,105 square metres with a pumping station of 359 square metres. The treatment works alone is 17 per cent of the total floorspace. A sewage plant is not a footnote to this application. It is a sixth of it.

[FACTUAL] What the recreational offer actually is cannot be read. Paragraph 4.23 of the Outline Operational Management Plan is supposed to list the recreational facilities. In the published version it consists of a single empty bullet point.

Fifty-seven residents to one member of night staff

[FACTUAL] The site would be run by approximately 130 staff, split into 108 on the day shift and 22 on the night shift. Set the night figure against the resident figure. Twenty-two people would be responsible, overnight, for up to 1,256 residents. That is one member of staff for every fifty-seven residents, on a site with a medical centre, isolation rooms, a single secured access, and no fire and rescue consultation on the record.

[SATIRE] The rota assumes a very quiet night. Every night. For at least ten years.

The car park with no cars, and the cycle rack for a thousand

[FACTUAL] Parking is provided for staff and visitors: 90 spaces in Phase 1 and 57 in Phase 2, a total of 147 car spaces, of which 139 are standard and eight accessible. There is no parking for residents at all. Paragraph 3.16 of the Planning Proposal Statement states plainly that no car parking is proposed for service users.

[FACTUAL] The cycle provision is the detail that gives the game away. The documents cannot even agree how many spaces there are: the Secretary of State's written statement records eight bicycle storage spaces, and the Transport Assessment records seven. Take the higher figure. Eight cycle spaces are proposed for a community of 1,256 residents and 130 staff, at a location the applicant's own documents describe as having no cycle infrastructure anywhere along the B4011. In the same breath the

Transport Assessment says cycling should be encouraged. There is nowhere to cycle to, no safe way to get there, and eight places to put the bicycle.

[FACTUAL] Put the movement figures together and the picture is a settlement of over 1,250 people, free to come and go, with no car and, in practice, no bicycle, on a national-speed-limit rural road with no footway. The Transport Assessment's answer is that they should use minibuses. Cross-reference the highway safety coverage elsewhere in this issue: the road, the footpath and the vests are not a separate story from this one. They are what this settlement's residents would walk into the moment they step outside the fence.

INFRASTRUCTURE DESK — OFF THE GRID, ON PURPOSE

Heated by nothing, powered by diesel, drained into a field

A town of 1,256 people needs power, heat, water and a way to get rid of sewage. Most towns connect to the mains. This one proposes to make its own electricity, treat its own sewage, and, in the meantime, tanker the waste away by lorry. Here is what that choice means, set against the connection the site does not propose to make.

Service	What is proposed on site	The mains alternative not taken	The catch: cost, smell, contamination
Electricity & heat	No gas supply, and none proposed. All heating, hot water and cooking is electrical. Peak demand ~2.16 MVA. The existing network 'cannot be relied upon', so generator compounds are built in Phase 1 and again in Phase 2.	A verified grid connection sized for the load, with no on-site combustion.	Diesel generation in open countryside for a minimum of ten years. No air-quality dispersion modelling of the generators. No noise model of the generators. No fuel storage, bunding or spill containment described, on ground over a Secondary A aquifer inside a Drinking Water Safeguard Zone.
Drinking water	Potable demand assumed at 140 litres per person per day for a design population of 1,386.	Supply designed to the adopted local standard of 110 litres per person per day.	The design assumption exceeds the adopted policy by about 27 per cent, in an area of serious water stress, and the conflict is not mentioned anywhere in the Planning Proposal Statement.
Sewage	A new on-site wastewater treatment works of 3,105 sqm plus a 359 sqm pumping station, discharging treated effluent to a watercourse. In Phase 1, an interim cesspool with the waste tankered away by lorry.	A connection to the public sewer and Bicester Sewage Treatment Works, which the applicant notes 'may' have headroom, subject to confirmation nobody has sought.	No outfall identified. No environmental permit applied for. The three outfall options are redacted in full. The interim tankering is conceded to be 'not a viable option' at full capacity, and the resulting lorry movements are not assessed in the Transport Assessment.
Odour	The sewage works sits about 100 metres from Phase 1 receptors, and in later phases the residential and welfare units are intended to be about 45 metres from it.	Sewage treated off site, at distance, by the statutory undertaker.	The applicant's own standard odour boundary for such works is about 250 metres. Sleeping accommodation is proposed at 45 metres. An existing community sports ground, Launton FC, sits about 130 metres away. No odour impact assessment has been carried out.
Waste	General and recyclable waste separated on site; no recycling carried out on site.	Municipal collection by the waste authorities, with disposal routes assessed.	No waste management strategy submitted. No assessment of the volume or disposal route of municipal, food or clinical waste from a facility feeding 1,256 people three meals a day and running a medical centre. Neither waste authority has been consulted.

[FACTUAL] Read the right-hand column downward. Every line is the applicant's own evidence. A town that cannot be connected to the grid, cannot yet treat its own sewage, cannot find an outfall, and must burn diesel and run lorries of waste to make the interim work, is a town that has been placed where the infrastructure is not. That is not a detail to be resolved by condition. It is the reason the site is the wrong site.

TRANSPARENCY DESK — THE PARAGRAPHS THAT AREN'T THERE

The section on suicide is blank. So is the one on how a death is handled.

Some things are missing from this application by accident. Some are redacted on purpose. And some sit in a third category that is harder to explain: a heading is printed, a number is printed, and then there is nothing underneath. The Outline Operational Management Plan is where a reader would expect to find how this community is kept safe. On the most serious questions of all, the page is empty.



"The government has found a new way to keep Piddington in the dark!"

[SATIRE] Funny what you can hide when you just redact information. The blatantly obvious just disappears.

The empty headings

[FACTUAL] The following numbered paragraphs of the Outline Operational Management Plan carry a heading in the contents list and in the body, and contain no text at all in

the published version. Paragraph 4.46, Suicide and Self Harm Prevention. Paragraph 4.47, Health and Safety. Paragraphs 4.48, 4.49 and 4.50, Handling a Death at the Site. Paragraphs 4.51, 4.52 and 4.53, Security. Also blank are 4.34 Admissions, 4.35 Access for New Arrivals, 4.36 Service Users Leaving and Returning to the Site, 4.37 and 4.38 Official Site Visitors, and 4.41 Access for Deliveries, Taxis, Sub-Contractors and Visitors.

[FACTUAL] These are not obscure appendices. Suicide and self-harm prevention, health and safety, and the handling of a death on site are the paragraphs a coroner, an inspector, or a worried relative would turn to first. In the document put before the public, each of them is a title with a blank space beneath it.

What is redacted, and what that pattern shows

[FACTUAL] Elsewhere in the pack, material is redacted openly. The three options considered for the outfall of the on-site sewage works are redacted in their entirety. Passages describing the existing foul drainage findings, and the electrical and telecommunications findings, are redacted mid-sentence. The names of the author, checker and approver are absent from every technical report. Redaction under a proper sensitive-information direction is lawful. What is not clear is whether any such direction has been made.

[FACTUAL] There is a statutory mechanism for this. Section 293B(11) of the Town and Country Planning Act 1990 allows a direction to withhold sensitive information. If such a direction has been made, it should be confirmed, and its extent

stated. If it has not, then the blanks are either a production error or a decision to publish an operational safety plan with its safety sections removed. The public has been given no way to tell which.

The question the blanks raise

[FACTUAL] Whatever the reason, the effect on a reader is identical in each case. The parts of the operational plan dealing with admissions, with residents leaving and returning, with deliveries, with suicide and self-harm prevention, with health and safety, and with the handling of a death on site, cannot be read. Nor can the parking, cycle parking and traffic figures on which the highways case depends. A consultation asks the public to comment on a plan. On these points, there is no plan to comment on.

[SATIRE] We do not know why a government department would print the words 'Handling a Death at the Site' and then leave the next three paragraphs blank. Perhaps the procedure is secret. Perhaps it is sensitive. Perhaps it has not been written. We would simply like to be told which, because the alternative is to assume that the most serious things that can happen to a human being on this site have been filed under 'to follow'.

[FACTUAL] PPC's request is narrow and reasonable. Publish a complete Planning Proposal Statement and a complete Operational Management Plan, or identify each omission as a redaction and state the statutory basis for it. That is not an unusual thing to ask of a public body consulting the public.

PROCEDURE DESK — THE FAST LANE, AND WHO IT LEAVES BEHIND

The urgent route was built for emergencies. This scheme is not ready to be built.

The application is made under the Urgent Crown Development route. That route exists so that genuinely urgent projects of national importance are not held up by the ordinary planning timetable. It comes at a price: less publicity, fewer guaranteed consultees, and a shorter window for the public. Our case is simple. The price is being paid, and the urgency that is supposed to justify it does not survive contact with the applicant's own documents.

What the fast lane actually costs

[FACTUAL] For a non-EIA urgent Crown application there is no obligation to invite public representations at all, no minimum representation period, no requirement for a site notice or newspaper publicity, and no requirement to notify adjoining occupiers. The wider statutory consultees are engaged only if the application is treated as EIA development. So the single gateway to guaranteed publicity, guaranteed consultation and a guaranteed minimum period is the EIA screening decision.

[FACTUAL] On 26 August 2026 that gateway was closed. Officials, on behalf of the Secretary of State, directed that the development is not EIA development. The direction letter gives no reasons of its own; it points to an attached written statement. The result is that Thames Water, the lead local flood authority, the Environment Agency, the Integrated Care Board, the fire service, the police and the ambulance service have no guaranteed right to be consulted, and none has given a substantive position on the record.

Why the urgency does not hold

[FACTUAL] The comparative test asks whether the development must be operational to a timescale that the ordinary route could not deliver. On the applicant's own figures, the non-urgent route takes about 12 weeks, or 16 for an EIA application. The whole saving claimed is a matter of a few weeks. Against that, weigh what the applicant's own consultants say is unresolved: the foul drainage solution is undetermined and its viability unknown; no intrusive ground investigation has been carried out; nine protected species surveys are outstanding; the outfall for the sewage works has not been identified and its permit not applied for; the electrical network cannot be relied upon; and the topographical survey is still being finalised.

[FACTUAL] There is a second problem with the urgency. The deadline is the applicant's own. The Statement on National Importance sets a programme assumption of approval by late August 2026. That is a date the Home Office chose and can revise. It is not an external constraint. And it has already passed: the screening direction was not issued until 26 August, and no decision had been made by then, yet the predicted consequence of missing the window has not been shown to have followed.

[SATIRE] To summarise the urgency case: we must skip the consultation to save four weeks, on a scheme that cannot yet be designed, drained, powered or surveyed, to meet a deadline we set ourselves and have already missed.

[FACTUAL] A project that is not ready to be built does not need a planning decision so urgently that the ordinary route becomes impossible. That is the heart of the objection to the route. The urgent procedure is being used not to meet a real emergency, but to shorten the public's involvement in a scheme whose own evidence base is incomplete. PPC does not, in this issue, mount a legal challenge to the screening direction. It asks the Secretary of State to publish the reasons, to open a representation period of at least 30 days, and to consult the omitted bodies on a voluntary basis. If the scheme is as strong as claimed, it can withstand being looked at properly.

STANDARDS DESK — TEN YEARS, OR FOREVER, OR BOTH

It is a temporary application. Four of its own documents say otherwise.

The description of development is a temporary change of use for ten years. That is what the front of the application says. Turn to the supporting documents, and the same scheme is described as long-term, as permanent, and as having no decommissioning plan at all. This is not a drafting slip. Whether the use is temporary or permanent decides how it should be assessed, what conditions should attach, and whether it belongs on this site in the first place.

The same scheme, four descriptions

Document	What it says the use is
Planning Proposal Statement (paras 1.3, 1.6, 3.1) and the description of development	A temporary change of use, for ten years.
Statement on National Importance	A route chosen to 'secure long-term operation'; a site that 'will subsequently be expanded for use as a long-term asylum accommodation solution'; and the need for 'certainty for permanent infrastructure solutions'.
Secretary of State's screening written statement	'The duration of operational phase is not specified'; at a minimum ten years 'with the potential for this to be extended'; 'There are no definitive plans for the decommissioning phase'; assessed as operating 'permanently as a worst case scenario'.
Transport Assessment (para 1.3.3)	'Temporary use, initially for a period of ten years (facilities are being designed to operate for longer in case use beyond ten years is required).'
Planning Proposal Statement (paras 5.84-5.88)	Requests retention of permitted development rights under eleven Parts of the GPDO, to give 'flexibility in the future to undertake small scale development projects not foreseen at the time'.

[FACTUAL] Read the table as a whole and the direction of travel is clear. The word 'temporary' appears on the form. Everything behind the form is built, described and future-proofed as permanent. The request to keep permitted development rights is the tell: you do not ask for standing permission to alter a site you intend to hand back in ten years.

Why the label matters

[FACTUAL] A ten-year temporary permission and a permanent one are assessed differently. A temporary scheme can lean on the argument that its harms are time-limited and reversible. A permanent scheme cannot. Several of this application's weakest points, on flood risk, on contamination, on landscape harm and on biodiversity, are softened by

the word 'temporary'. If the true intention is permanence, as four of the applicant's own documents indicate, then the assessment has been carried out against the wrong test.

[SATIRE] The scheme is temporary in the way a conservatory is temporary. It is going up for ten years, and then for as long after that as nobody gets round to taking it down, which the screening

statement helpfully confirms is a plan that does not exist.

[FACTUAL] PPC's request is that the applicant state, unambiguously, what it is applying for; that any permission be limited by condition to a defined period with a restoration scheme secured; and that the permitted development rights under Part 19 be removed for this site, so that any future expansion is judged on its own merits.

VALIDATION DESK — THE CHECKLIST NOBODY TICKED

Held against Cherwell's own list, this application would not have been validated

Because the application goes to the Secretary of State and not to the council, Cherwell's local validation checklist does not apply to it as a matter of law. But the checklist is the council's published statement of what it needs to assess a scheme of this kind, and the same development plan governs the decision whichever route is used. So it is the fair yardstick. Measured against it, the gaps are not marginal. Fourteen categories of required information are absent altogether.

What Cherwell's list requires	What the application provides	Status
Biodiversity Net Gain statement and metric (also required by statute)	The phrase is not used anywhere; no metric, no baseline, no route to gain	Absent
Lighting Assessment for any application with external lighting	None; the applicant says lighting is not yet designed	Absent
Contaminated Land Assessment: Phase 1 desktop and Phase 2 intrusive	Phase 1 only; no soil, groundwater or ground-gas sample taken on a former ordnance depot	Part only
Noise Impact Assessment	A screening note on road traffic; no assessment of the generators or sewage plant	Part only
Air Quality Assessment	A screening note on traffic and dust; no point-source combustion assessment	Part only
Odour Impact Assessment where odour sources sit near sensitive uses	None, despite sleeping rooms proposed 45m from the sewage works	Absent
Energy statement, BREEAM, CHP/district-heating and renewables feasibility	None; deferred to post-permission conditions	Absent
Flood evacuation and emergency response plan; safe access and egress	None; not addressed in the Flood Risk Assessment	Absent
Tree survey and arboricultural impact assessment	None	Absent
Parking and servicing details, including a servicing schedule	Figures omitted or contradictory; no servicing schedule	Part only
Legible drawings: elevations, floor plans, sections, layouts	Three drawings for approval; no elevations, floor plans or sections; key numbers not legible	Part only
Waste management strategy	Two sentences; no strategy; waste authorities not consulted	Absent

[FACTUAL] The council's checklist is calibrated to the very harms this site raises: contamination, flooding, ecology, lighting, odour. Each requirement maps onto a matter the

application leaves open. Where an application would not have been validated by the authority whose development plan governs the decision, that is a matter of

substance, not paperwork. It is a strong sign that the material is not sufficient for an informed planning judgement.

WHITEHALL DIARY — NAMED, FACTUAL AND ENTIRELY DESERVED

Whitehall Diary

Every statement attributed below is a real, published, sourced statement. The commentary is ours.

Matthew Pennycook MP, Minister of State for Housing and Planning, wrote to Calum Miller MP on 13 July 2026 to say the proposal had been “*deemed Nationally Important and Urgent*”. His letter states that the application was made “*to the Planning Inspectorate*” under “*Section 293D*” and the “*Crown Development Applications (Procedure and Written Representations) Order 2025*”.

Seven days later, on the same case reference, his department told Cherwell District Council that the application was made **to the Secretary of State**, under **section 293B**, and the **Urgent Applications Order**.

Those are two different routes with two different sets of rights for objectors. The Minister who certified the scheme as urgent described it, in writing, under the non-urgent procedure. Diary notes that the Home Office’s own Article 5 compliance statement makes the identical error, citing the non-urgent Order in its body and the urgent Order in its heading. Two documents, one departmental, one ministerial, both wrong in the same way. Diary invites readers to draw the obvious conclusion about how carefully either was read.

Alex Norris MP, Minister of State for Border Security and Asylum, told the Commons on 25 June 2026 that

Bicester, Barnham and Linton-on-Ouse were under consideration “*subject to feasibility assessments, planning permission and the necessary approvals*”.

Diary observes that the application form for Bicester was signed on the very same day, 25 June 2026, and that the form’s own printed instruction beside the date field reads: “*(date cannot be pre-application)*”.

The Planning Casework Unit issued the screening direction of 26 August 2026 concluding that a development of 984 modular units, 1,256 residents, a sewage treatment works, a 15,950 square metre demolition and an unknown quantity of unexploded ordnance is “*not likely to have significant effects on the environment*”.

It is signed “*Planning Casework Unit*”. Beneath that: “*This decision was made by officials on behalf of the Secretary of State, and signed on her behalf*”. Nobody is named. The salutation reads “*Dear*”, and then stops.

Diary notes that the same document describes the works as “*a minor physical change to the locality*”, and that the applicant asked the Secretary of State to screen the Secretary of State’s own project rather than asking the local planning authority, which was sent a copy for information.

The Home Office paid Natural England for pre-application advice under a commercial quotation dated 18 May 2026, gave it an email instead of the drainage design, and submitted the resulting non-binding letter with its planning application as “*Natural England advice*”. That letter asked to be re-consulted.

Diary would be fascinated to know whether it has been.

Whoever wrote the covering letter of 6 July 2026 informed the Ministry of Housing, Communities and Local Government that the Air Quality Technical Note was still “*being finalised*” and would follow. That note’s own document control block records: “*Issue: 1. Status: First Issue. Date: 26th June 2026*”, ten days earlier. Diary offers no theory, merely the two dates.

Whoever assembled the Planning Proposal Statement copied the covering letter’s enclosure list into it wholesale, with the result that the Planning Proposal Statement now lists, among the documents it encloses: “***This covering letter***”. Diary has read a great many planning statements and has never before encountered one that believed it was a letter.

The Equality Impact Assessment, signed off on 28 May 2026, carries a section marked: “*It contains sensitive information and is for internal use only. This section should not be published. Please redact the section below if you intend to publish your EIA outside of the Department.*”

It was published, unredacted, in the planning application pack. Its consent boxes for publication are both unticked and its publication status reads “*[Not decided yet]*”. Diary can confirm that it has now been decided.

The same document contains no mention of Hillside Park, the twelve-pitch Gypsy and Traveller site 150 metres to the south, whose residents have a protected characteristic under the race provisions of the Equality Act.

HOME OFFICE EXCUSE BINGO — THE APPLICATION EDITION

Free to play. Every square below is a genuine phrase from the submitted application documents. Mark one off each time you meet it. First to a full house wins a pre-commencement condition.

“Yet to be determined”	“Subject to confirmation at a later design stage”	“Currently unknown”	“Further survey is required”
“It is assumed that...”	“Should be regarded as concept”	“Secured by a pre-commencement condition”	“No likely significant effects”
“Capable of complying”	FREE SPACE “Prepared by: XX”	“Not possible at RIBA 2”	“Impacts ... are unknown”
“Largely self-sufficient”	“This assumes the worst-case and provides a robust assessment”	“Extensive surveys are ongoing”	“Description of revision: [blank]”

Letters to the Editor

The letters below are illustrative examples in the classic pseudonymous local-paper style. Replace with genuine reader letters where you have permission to print them, or keep as clearly signposted illustrative pieces.

Sir, I write to offer my services. I have lived on the B4011 for thirty-one years and I am willing to stand at the roadside, in a high-visibility vest, and count the vehicles that do not stop for me. I estimate the survey would take under a minute. I would ask only that the Home Office send someone to hold my coat. And try not to pull me back on to the site because of my hi-vis.

Resident beside Site A

Sir, Your correspondent asks how the Government can be certain there are no significant effects from a lighting scheme that does not exist. Might I suggest that this is the safest kind of scheme there is. Nothing that has not been designed has ever gone wrong.

A Concerned Ratepayer, Piddington

Sir, I note the sewage of 1,256 men is to be calculated on the basis that they are holidaymakers in a chalet. I have holidayed in a chalet. There was a pavement.

Name and address supplied, Blackthorn

Sir, As a keen local historian I was delighted to learn from the Home Office that our parish sits at the heart of medieval cross-channel trade. I have looked. The nearest channel is a drainage ditch, and even that is blocked.

A Former Inquiry Attendee, Ambrosden

Sir, I understand the Government requires the whole of my parish to accept, at four weeks' notice, a decision founded on two boreholes 300 metres away, a traffic count from Essex, one spring afternoon's ecology and a fire strategy with no exits in it. I should like to know whether I may submit my objection on the same terms.

Ratepayer, Upper Arncott

Sir, Would XX please contact the parish office. XX has left several documents here and we would very much like to return them.

Clerk, Piddington

SPOT THE DIFFERENCE — A SCHEDULE OF INCONSISTENCIES

One site. One application. Two answers to everything.

Every row below sets one submitted government document against another. None of these is our interpretation. They are direct contradictions on the face of the papers.

Question	One document says	Another says
How many people?	1,256 (almost everywhere)	<i>“3,510 service users”</i> (UXO risk assessment, twice); <i>“c800 ... with a further 450 ... totalling 1,250”</i> (Landscape Statement and HRA)
How big is the site?	10.22 ha (application form)	10.1 ha (screening direction); 9.36 ha (utilities); 5 ha (equality assessment); <i>“approximately 50 hectares”</i> (heritage)
How fast is the road?	50 mph (transport assessment, travel plan, screening direction)	60 mph (planning statement, utilities); <i>“62 mph”</i> (the standard the visibility splays were actually designed to)
Which road is it?	B4011	B1104 (transport assessment, ten times); B0411 (planning statement); B4001 (geo-environmental); A4011 (heritage, three times)
How far is Piddington?	250 m (screening direction)	706 m, 750 m and 800 m (planning statement); 700 m (landscape); 1.3 km (transport)
How far is the prison?	307 m (screening direction)	500 m (transport assessment); 300 m (written statement, same document)
Which access is used?	Southern, for the swept-path safety case	Northern, for the capacity model, the travel plan and the Home Office’s own statement. The northern one is the unlit one with no footway.
Which end floods?	<i>“The southern access and the southern and eastern portions”</i> (drainage)	<i>“The northern access and the northern and eastern areas”</i> (screening request). Same visit, same broken pumps, same sentence, opposite compass.
When was the site visit?	25 February 2026 (drainage, four times)	26 February 2026 (screening request)
Is there power?	<i>“The existing electrical infrastructure cannot be relied upon”</i> (utilities, June 2026)	<i>“Electrical capacity appears available at a site wide level”</i> (drainage, June 2026)
Where does the sewage go?	New on-site works discharging to a watercourse (drainage and utilities)	<i>“It is anticipated that foul water will be connected to mains”</i> (Home Office to Natural England, 16 July)
Greenfield runoff?	Phase 1 <i>“cannot be restricted to greenfield rates”</i> (drainage, June)	<i>“Designed to ensure greenfield runoff rates”</i> (Home Office to Natural England, July)
Are there fuel tanks?	<i>“No fuel storage tanks were identified on site”</i>	<i>“Unspecified Tank (2 No.) 1982 to 1992”</i> , from the same database search
Were munitions stored?	<i>“Research has not specifically identified any munitions-type storage”</i> (UXO)	Sample <i>“the area where munitions were handled and stored”</i> (drainage)
How much demolition?	<i>“Five existing Nissen Huts”, groundworks “minimal”</i>	15,950 sqm across five buildings; 24 Nissen and Romney sheds on site, with Phases 2 and 3 on their slabs
Is the site in use?	<i>“Non-operational for a number of years and currently vacant”</i> (landscape)	<i>“Leased to DNS for defence storage and is in active use”</i> (travel plan)
Is it a greenfield site?	<i>“The Site is an irregular shaped greenfield area”</i> (screening request)	A 1943 ordnance depot with hardstanding, railway sidings, asbestos and possible unexploded ordnance

Question	One document says	Another says
What kind of site was it?	<i>"A non-operational former RAF site"</i> (screening request, waste section)	An Army Central Ordnance Depot. RAF Wethersfield is the comparator, in Essex.
How long for?	<i>"A proposed period of 10 years"</i> (planning statement)	<i>"It is assumed that the Proposed Development operates permanently"</i> (screening direction); <i>"expanded for use as a long-term ... solution"</i> (statement of national importance)
How long will people stay?	<i>"For a maximum of 90 days"</i> (screening direction, stated as fact)	<i>"A maximum length of stay may be imposed ... subject to confirmation"</i> (equality assessment). The planning statement is silent.
How deprived is the ward?	<i>"More deprived than 71% of neighbourhoods in England"</i>	<i>"Ranked in the second most deprived percentile"</i> . Same document.
How much floorspace?	17,935 sqm (planning statement)	17,350 sqm (statutory application form). The digits are transposed.

WHAT YOU CAN ACTUALLY DO ABOUT IT — AND A NOTE ON TONE

Objecting properly

This magazine exists to make an unreadable planning process readable. The process itself is where the decision gets made. Here is where to put your energy.

1. Submit a representation, and do it now. Under the Urgent Crown Development procedure the timescales are short and there is no guaranteed consultation period of the kind you would get on an ordinary application. Representations must be sent to the Secretary of State via the Planning Casework Unit, and Cherwell District Council group to forward any it receives. The case references currently in circulation are **PCU/RARE/J1725/3378659** for the application and **PCU/EIASCR/C3105/3378828** for the screening.

2. Object to the evidence, not to the people. The strongest representations engage with specific, sourced, checkable failures. Every quotation in this magazine is one. The most effective points are the ones the Home Office has made against itself:

- Nine protected species surveys outstanding, and an ecological report that says it *"cannot be considered a comprehensive assessment"*.
 - No intrusive ground investigation on a former ammunition depot.
 - No confirmed water, power or sewage capacity, and no contact with Thames Water.

- A fire strategy with no travel distances, no exits and no firefighting water supply.
- A transport case built on a road in Essex, with no pedestrian assessment and an unsecured shuttle bus.
- No biodiversity net gain assessment at all.
- Natural England asked to be re-consulted, and the documents that resolved its concern are unpublished.

3. Ask for the missing documents. The Natural England communications of 23 July, 11 August and 13 August 2026; the trip generation tables; the Security Management Plan; the biodiversity gain information; and the identity of the consultants who wrote all of this. PPC has requests outstanding on each.

4. Contact your MP calum.miller.mp@parliament.uk

5. Contact your CDC
Councilor timothy.faltermeyer@cherwell-dc.gov.uk

6. Get involved. Piddington Parish Council are coordinating evidence, Freedom of Information requests and formal objections.
piddington.parish.clerk@piddingtonpc.org

7. Share this magazine. It exists to be read, forwarded and argued about. That is rather the point of a free press.

A note on tone, for anyone reading this cold

This publication objects to a rushed and poorly evidenced planning decision at a specific, unsuitable site. It does not object to the presence of people seeking asylum in the United Kingdom, and it does not object to the individuals who would be housed here.

The satire in these pages is aimed squarely at process failures: the surveys not carried out, the documents nobody signed, the road in the wrong county, the sewage works forty-five metres from a bedroom, the fire strategy with no exits, the statutory consultee told the opposite of what the applicant's own engineers had written.

Where the residents of the proposed site are mentioned, it is because their safety and wellbeing is precisely what this objection is trying to protect. A man walking an unlit national-speed-limit road in a high-visibility vest, because that is the Government's published mitigation, is not a joke at his expense. It is a joke at the expense of the people who wrote it down and thought it would do.