From: [redacted]
To: Crown Casework
Cc: calum.miller.mp@parliament.uk; wpwsobjection@gmail.com
Subject: 20260912 Formal Objection of Application PCU/RARE/C3105/3378843 (MOD Bicester, Site A)
Date: 12 September 2026 08:04:29

[redacted]

Dear Sir/Madam,

Revised objection resubmitted following the recent publication of the Equality Impact Assessment (EIA)

I am writing as a woman living in Bicester to formally object to application PCU/RARE/C3105/3378843 for the proposed 1,256-person asylum accommodation centre at Site A, MOD Bicester.

The objection is based on the fact that the application is **materially incomplete**, and renders any **approval irrational** and **procedurally unfair**.

The incomplete application contains unresolved risks across safeguarding including women and girls, rural community proportionality and impact, community cohesion, value for money, ground contamination, drainage and surface-water flooding, wastewater, ecology, fire safety and decommissioning, meaning the Secretary of State cannot lawfully conclude the site is safe or suitable.

I request that planning permission be refused.

1. Illegality – incomplete evidence and failure to discharge statutory duties

Despite the Government's recent statement, the application remains materially incomplete. Critical assessments across contamination, drainage, flooding, wastewater, ecology, highways, lighting, noise, fire safety and decommissioning remain outstanding.

A lawful decision cannot be made without this evidence. The Secretary of State cannot discharge duties under the Town and Country Planning Act 1990 or justify the use of Crown Development powers on an incomplete record.

2. Procedural unfairness – consultation and factual errors

The Government states that "all factors will be properly considered," yet the consultation period is far shorter than the standard 21-day minimum used for Crown Development. For an application exceeding 1,000 pages, this is procedurally unfair.

The Transport Assessment contains factual errors, including repeated reference to the wrong road.

- Use of the wrong road number (**B1104** instead of **B4011**)
- Inclusion of data and tables clearly lifted from other sites ("Nearest Bus Services - Bullingdon Prison", Trip Generation - Wethersfield"), not MOD Bicester. These locations have different transport networks, bus frequencies, pedestrian routes, and collision histories.
- Misdescription of local transport conditions. Failing to acknowledge the B4011 has no footways along the site frontage. Understates the collision history. Overstates walkability to services that are not realistically accessible on foot.
- Incorrect assumption about bus services. Lists bus services that do not run past the site. Use bus timetables from other locations.
- Collision data misinterpreted. Underreports the severity of the collisions. Fails to analyse causation. Does not assess how 1,256 residents will increase risk on a road with known serious collisions.

This **undermines the reliability of the evidence** placed before the public and statutory consultees.

3. Irrationality – claims of "self-sufficiency" contradict the evidence

The Government asserts that former MOD sites are "largely self-sufficient." However, the application confirms that diesel generators will be used to power the site, demonstrating that essential infrastructure is not in place.

There is no confirmed permanent solution for electricity, wastewater, drainage or safe pedestrian access. A decision to approve a 1,256-person development without these fundamentals would be irrational.

If the site is not genuinely self-sufficient, **spillover into the community is inevitable**, increasing risks for females.

4. Failure to consider material considerations

The Government's response does not address:

• the site's previous refusal for asylum accommodation by an independent Planning Inspector
• conflict with the Cherwell Local Plan and MOD disposal strategy
• unresolved safeguarding and cohort-suitability issues identified across other MOD sites
• unresolved infrastructure deficiencies

These are plainly material considerations and must be addressed before any lawful decision is made.

5. Community impact – women's safety and rural isolation

As a woman, I am deeply concerned about the proposal's impact on personal safety. There is limited **equality impact assessment**, no gender-impact analysis, and no community-safety plan. This is a **material omission**.

Thames Valley Police have already stated that asylum sites increase policing demand and no additional resources have been guaranteed.

The application does not demonstrate:

- increased patrols
- community-safety measures
- female-focused safeguarding
- night-time safety planning, noting that street lights are to be turned off at night
- risk-management for isolated rural communities

This is a **material planning consideration** that has not been addressed.

The proposal fails to demonstrate safeguarding of local women because it provides no gender-impact assessment, no community-safety plan, no pedestrian-safety mitigation, no policing strategy, and an no analysis of women's daily movements, including school-run routes, commuting, walking on rural roads, accessing bus stops, or working in isolated rural business,. no evidence that an open facility housing 1,250 adult men can operate without creating increased risks for women in an isolated rural environment.

Failure of the Equality Impact Assessment

The Equality Impact Assessment (EIA) is unlawfully narrow in scope and fails to comply with the Public Sector Equality Duty because it considers only the protected characteristics of asylum seekers accommodated on the site and does not assess the foreseeable equality and safety impacts on women in the surrounding rural villages and communities. The EIA repeatedly frames its analysis around “those accommodated at the site” and assumes that the development will be “self-sufficient,” yet the same document confirms the facility is non-detained and residents may freely leave the site, creating predictable external impacts. Despite proposing to house 1,256 single adult men in an open facility located on an unlit rural road with no footways, no passive surveillance, and no nearby services, the EIA contains no gender-impact assessment, no analysis of women’s daily movement patterns, no consideration of night-time safety, and no assessment of risks to women walking, commuting, or working in isolated rural settings. By omitting any evaluation of how the proposal affects women outside the site—who are plainly within the class of persons affected by the decision—the Secretary of State has failed to have due regard to the need to eliminate discrimination and advance equality of opportunity, rendering the EIA legally deficient and any decision relying on it unlawful.

Conclusion

The Government’s statement does not resolve the legal, procedural or evidential deficiencies in the application. The proposal remains incomplete, irrational, and contrary to statutory requirements and the development plan.

For these reasons, I respectfully request that **planning permission be refused**.

If the Secretary of State is nevertheless minded to approve the application, I request that no decision is made until all outstanding assessments have been completed, published, and subject to a full and lawful consultation period.

Yours sincerely,

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