Crown Casework Unit
On behalf of the Secretary of State for Housing, Communities and Local Government
Ministry of Housing, Communities and Local Government
23 Stephenson Street
Birmingham
B2 4BH

[redacted]

Our ref CASK/ASDM
Your ref PCU/RARE/C3105/3378843

7 September 2026

Dear Sirs

Urgent Crown Development Application: PCU/RARE/C3105/3378843 (the "Application")

MOD Bicester (Site A), Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE (the "Site")

Request for an extension of the representation period to not less than 21 days

We write on behalf of our client, Value Retail Management (Bicester Village) Limited acting as managing agent for the owners of Bicester Village ("**Value Retail**"), in connection with the Application, which seeks permission for the following development (the "**Development**") at the Site:

> "*the temporary change of use of the former 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, wastewater 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 users".

Bicester Village is one of the UK's most significant retail and tourist destinations, attracting over 6.5 million guests a year and directly supporting more than 3,500 jobs. Accordingly, Value Retail, together with its local communities and stakeholders, have a direct interest in being given a fair and reasonable period to assess and make meaningful representations for this Application of national importance.

We note that the Application was submitted on 6 July 2026 and subsequently validated and published on the Government's website on 2 September 2026. On 4 September 2026, the Government confirmed that the public may submit representations on the Application, with a representation period running from 7 to 17 September 2026 (a period of only 10 days).

Value Retail welcomes the Secretary of State's decision to invite public representations. However, for the reasons set out below, a 10-day representation period is wholly inadequate. We respectfully request that the representation period be extended to at least 21 days from 7 September 2026. Given that the 21st day would fall on a Sunday, the period should be extended to the next working day of Monday 28 September 2026.

Request for an extension to the representation period to not less than 21 days

The Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025 does not prescribe a minimum representation period for statutory consultees, the LPA or the public under Articles 13, 15 and 20 respectively, but the starting point should be not less than 21 days. That period is established across the planning system for non-EIA development and a 10-day period is wholly inadequate for a development of this significance.

For normal planning applications under the Town and Country Planning Act 1990 ("**TCPA 1990**"), the Town and Country Planning (Development Management Procedure) (England) Order 2015 requires a minimum 21-day representation period for statutory consultees and the public. For non-urgent Crown development applications under Section 293D of the TCPA 1990, the Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025 prescribes 21 days at every stage of the consultation process. Accordingly, Parliament has repeatedly determined 21 days to be the minimum necessary for parties to review planning documents and formulate considered representations. A representation period of 10 days is less than half of this established standard.

The standard minimum 21-day period should not be departed from unless there is demonstrable justification for doing so, and no such justification exists here. Nearly two months elapsed between the Application being submitted on 6 July 2026 and its validation and publication on 2 September 2026. If the urgency of the proposal permitted a period of nearly eight weeks for determining whether the Application should be accepted, it is reasonable to allow at the very least 21 days for public consultation. Moreover, the fact that the Application is an urgent Crown development application does not, of itself, require a representation period shorter than 21 days. The urgency relates to the overall need for an expedited planning process; it does not follow that each individual procedural stage must be curtailed.

The significance of the Development further underscores the need for a proper representation period of at least 21-days. The Application concerns a proposal of very considerable significance – accommodation for up to 1,256 asylum seekers on a site in a rural part of Oxfordshire for a period of 10 years. It will have significant implications for, amongst other things, local transport infrastructure, the

local economy, public services and amenity. Bicester Village is one of the most visited retail and tourist destinations in the UK and is directly affected by those implications. It is clearly in the public interest that the Secretary of State should have the benefit of properly considered representations from the local community and affected stakeholders before determining an application of this magnitude. Further, a proposal for an asylum accommodation centre on the Site was previously considered by the Secretary of State between 2002 and 2003. Given a public inquiry was held on that occasion, it would be unreasonable and disproportionate to allow only 10 days for representations on the Application, which seeks permission for development of a similar nature.

Fairness reinforces the point. The application documents exceed 1,000 pages and are technically complex, spanning multiple disciplines. Value Retail and other stakeholders need adequate time to review those documents, instruct multi-disciplinary professional advisers and prepare properly considered representations. A period of shorter than 21 days would not afford Value Retail and other stakeholders a fair opportunity to respond.

Conclusion

For the reasons set out above, we respectfully request that the Secretary of State extends the representation period to at least 21 days from 7 September 2026. In particular, given that the 21st day would fall on a Sunday, the period should be extended to the next working day of Monday 28 September 2026.

Given the representation period begins today, we would be grateful for an urgent response to this request.

Yours faithfully

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CMS Cameron McKenna Nabarro Olswang LLP