

Inquiries and Major Casework Team
The Planning Inspectorate

23 January 2023

via Appeals Casework Portal

cc Fiona Bradley
Greater Cambridge Shared Planning
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Dear Planning Inspectorate

Application Reference: 22/02771/OUT
Land to the north of Cambridge North Station, Cambridge

Mills & Reeve LLP is instructed by Brookgate Land Limited (on behalf of the Chesterton Partnership) ("**the Appellant**") to submit this appeal against the non-determination by South Cambridgeshire District Council ("**the LPA**") of the hybrid planning application for both outline and detailed permission at Land North of Cambridge North Station with reference 22/02771/OUT (the "**Application**").

We enclose for your attention the completed Appeal form together with the following:

- 1) Full Statement of Case.
- 2) Application Forms (cover letter, together with two original application forms, all dated 14 June 2022, and an updated Outline Application Form dated 29 June 2022 (submitted at LPA's request)).
- 3) LPA validation letter dated 24 June 2022 (in lieu of a decision notice).
- 4) Site Plan (references 239-ACME-PLA-S00-0000 and 239-ACME-PLA-S00-0011).
- 5) a) Copies of all plans, drawings and documents sent to the LPA as part of the application.
b) A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA.
- 6) a) Copies of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application.
b) A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application.
- 7) A copy of the design and access statement sent to the LPA
- 8) A copy of a draft statement of common ground.
- 9) A list and copies of relevant correspondence with the LPA.
- 10) A copy of the Environmental Statement and Appendices.

Time period for determination

The Application was validated on 15 June 2022, with an original target date for determination of 5 October 2022. On 13 July 2022, an extension of time was agreed until 26 October 2022. On 21 September 2022, a further extension of time was agreed between the Applicant and the LPA to 23 November 2022. The LPA has not determined the Application by this date.

Statement of which procedure the Appellant considers should be used to determine the Appeal

The Appellant considers this Appeal should be determined using the Inquiry Procedure. This is for the following reasons:

- 1) As the Application has not been determined, the LPA has not issued a decision notice, however, following recent communication with the LPA, the Appellant anticipates the LPA raising putative reasons for refusal, which will require evidence being tested through formal questioning by an advocate before an Inspector. The Appellant has accordingly instructed Sasha White KC as Leading Counsel.
- 2) The proposal constitutes a major development scheme comprising both outline and detailed elements, on a large-scale site allocation in an adopted Local Plan, which is of significant local, regional and national importance. The scale and nature of the development proposals justify an Inquiry procedure.
- 3) It is anticipated that there will be complex issues involved. To the extent that matters cannot be agreed in a statement of common ground, the Appellant anticipates expert evidence being required in connection with the following topic areas: masterplanning, architecture, landscaping and open space, heritage, landscape and visual impact, highways, office and lab supply, economic benefits and planning.
- 4) It is anticipated that there will be substantial public interest in the scheme.

Notice of Intention to Appeal

Notice of an intention to submit an appeal for which the inquiry procedure will be requested, in accordance with Recommendation 3 of the Rosewell Review, was sent to the LPA and the Planning Inspectorate on 19 December 2022.

Should you have any questions surrounding this submission, or should you require any further information or clarification, please do not hesitate to contact Katrina Aslan-Tipler or Peter Seaborn of Mills & Reeve.

We look forward to receipt of the start date in due course.

Yours faithfully



Mills & Reeve LLP
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