

The Planning Inspectorate

PLANNING APPEAL FORM (Online Version)

WARNING: The appeal **and** essential supporting documents **must** reach the Inspectorate within the appeal period. **If your appeal and essential supporting documents are not received in time, we will not accept the appeal.**

Appeal Reference: APP/W0530/W/22/3307903

A. APPELLANT DETAILS

The name of the person(s) making the appeal must appear as an applicant on the planning application form.

Name	Cassel Hotels (Cambridge) Ltd
Address	C/o Agent
Phone number	
Email	
Preferred contact method	Email <input checked="" type="checkbox"/> Post <input type="checkbox"/>

B. AGENT DETAILS

Do you have an Agent acting on your behalf?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Name	MR JACK GANDY
Company/Group Name	BIDWELLS LLP
Address	Bidwells Trumpington Road, Trumpington CAMBRIDGE CB2 9LD
Phone number	07810 508440
Email	jack.gandy@bidwells.co.uk
Preferred contact method	Email <input checked="" type="checkbox"/> Post <input type="checkbox"/>

C. LOCAL PLANNING AUTHORITY (LPA) DETAILS

Name of the Local Planning Authority	South Cambridgeshire District Council
LPA reference number	21/00953/FUL

Date of the application

01/03/2020

Did the LPA validate and register your application?

Yes No

Did the LPA issue a decision?

Yes No

Date of LPA's decision

22/07/2022

D. APPEAL SITE ADDRESS

Is the address of the affected land the same as the appellant's address?

Yes No

Does the appeal relate to an existing property?

Yes No

Address

Former Hotel Felix
Whitehouse Lane, Girton
CAMBRIDGE
CB3 0LX

Is the appeal site within a Green Belt?

Yes No

Are there any health and safety issues at, or near, the site which the Inspector would need to take into account when visiting the site?

Yes No

E. DESCRIPTION OF THE DEVELOPMENT

Has the description of the development changed from that stated on the application form?

Yes No

Please enter details of the proposed development. This should normally be taken from the planning application form.

Demolition of existing buildings and erection of a care home (Use Class C2) with external amenity space, access, parking, landscaping and other associated works.

Area (in hectares) of the whole appeal site [e.g. 1234.56]

1.39 hectare(s)

Area of floor space of proposed development (in square metres)

4645 sq metre(s)

Does the proposal include demolition of non-listed buildings within a conservation area?

Yes No

F. REASON FOR THE APPEAL

The reason for the appeal is that the LPA has:

1. Refused planning permission for the development.
2. Refused permission to vary or remove a condition(s).
3. Refused prior approval of permitted development rights.
4. Granted planning permission for the development subject to conditions to which you object.
5. Refused approval of the matters reserved under an outline planning permission.
6. Granted approval of the matters reserved under an outline planning permission subject to conditions to which you object.
7. Refused to approve any matter required by a condition on a previous planning permission (other

than those specified above).

8. Failed to give notice of its decision within the appropriate period (usually 8 weeks) on an application for permission or approval.

9. Failed to give notice of its decision within the appropriate period because of a dispute over provision of local list documentation.

G. CHOICE OF PROCEDURE

There are three different procedures that the appeal could follow. Please select one.

1. Written Representations

2. Hearing

3. Inquiry

You must give detailed reasons below or in a separate document why you think an inquiry is necessary. The reasons are set out in

the box below

There has been significant public interest (47no. letters of objections, 33no. letters of support) in the application.

The issues to be determined relate to the impact on the Green Belt, the need for older people's accommodation and care, the alleged harm to a non-designated heritage asset and the application of 'Very Special Circumstances' under paragraph 148 of the NPPF (2021).

These issues are complex and there is a clear need for the evidence to be tested through a formal advocate.

(a) How many witnesses do you intend to call?

(b) How long do they need to give their evidence?

- Architect: 2 hours (examination-in-chief). Cross-examination: unknown.
- Heritage: 2 hours (examination-in-chief). Cross-examination: unknown.
- Visual Impact and Green Belt: 3 hours (examination-in-chief). Cross-examination: unknown.
- Need: 1.5 hours (examination-in-chief). Cross-examination: unknown.
- Planning: 3 hours (examination-in-chief). Cross-examination: unknown.

(c) How long do you estimate the inquiry will last?

(d) Is there any further information relevant to the inquiry which you need to tell us about?

H. FULL STATEMENT OF CASE

see 'Appeal Documents' section

Do you have a separate list of appendices to accompany your full statement of case? Yes No

(a) Do you intend to submit a planning obligation (a section 106 agreement or a unilateral undertaking) with this appeal? (Please attach draft version if available) Yes No

see 'Appeal Documents' section

(b) Have you made a costs application with this appeal?

Yes

No



I. (part one) SITE OWNERSHIP CERTIFICATES

Which certificate applies?

CERTIFICATE A

I certify that, on the day 21 days before the date of this appeal, nobody, except the appellant, was the owner of any part of the land to which the appeal relates;



CERTIFICATE B

I certify that the appellant (or the agent) has given the requisite notice to everyone else who, on the day 21 days before the date of this appeal, was the owner of any part of the land to which the appeal relates, as listed below:



CERTIFICATE C and D

If you do not know who owns all or part of the appeal site, complete either Certificate C or Certificate D and attach it below.



I. (part two) AGRICULTURAL HOLDINGS

We need to know whether the appeal site forms part of an agricultural holding.

(a) None of the land to which the appeal relates is, or is part of, an agricultural holding.



(b)(i) The appeal site is, or is part of, an agricultural holding, and the appellant is the sole agricultural tenant.



(b)(ii) The appeal site is, or is part of, an agricultural holding and the appellant (or the agent) has given the requisite notice to every person (other than the appellant) who, on the day 21 days before the date of the appeal, was a tenant of an agricultural holding on all or part of the land to which the appeal relates, as listed below.



J. SUPPORTING DOCUMENTS

01. A copy of the original application form sent to the LPA.



02. A copy of the site ownership certificate and agricultural holdings certificate submitted to the LPA at application stage (if these did not form part of the LPA's planning application form).



03. A copy of the LPA's decision notice (if issued). Or, in the event of the failure of the LPA to give a decision, if possible please enclose a copy of the LPA's letter in which they acknowledged the application.



04. A site plan (preferably on a copy of an Ordnance Survey map at not less than 10,000 scale) showing the general location of the proposed development and its boundary. This plan should show two named roads so as to assist identifying the location of the appeal site or premises. The application site should be edged or shaded in red and any other adjoining land owned or controlled by the appellant (if any) edged or shaded blue.



05. (a) Copies of all plans, drawings and documents sent to the LPA as part of the application. The plans and drawings should show all boundaries and coloured markings given on those sent to the LPA.



05. (b) A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA.



05.(c) A list of all plans, drawings and documents upon which the LPA made their decision.



06. (a) Copies of any additional plans, drawings and documents sent to the LPA but which did not form part of the original application.



06. (b) A list of all plans, drawings and documents (stating drawing numbers) which did not form



part of the original application.

07. A copy of the design and access statement sent to the LPA (if required).
08. A copy of a draft statement of common ground if you have indicated the appeal should follow the hearing or inquiry procedure.
09. (a) Additional plans, drawings or documents relating to the application but not previously seen by the LPA. Acceptance of these will be at the Inspector's discretion.
09. (b) A list of all plans and drawings (stating drawing numbers) submitted but not previously seen by the LPA.
10. Any relevant correspondence with the LPA. Including any supporting information submitted with your application in accordance with the list of local requirements.
11. If the appeal is against the LPA's refusal or failure to approve the matters reserved under an outline permission, please enclose:
- (a) the relevant outline application;
- (b) all plans sent at outline application stage;
- (c) the original outline planning permission.
12. If the appeal is against the LPA's refusal or failure to decide an application which relates to a condition, we must have a copy of the original permission with the condition attached.
13. A copy of any Environmental Statement plus certificates and notices relating to publicity (if one was sent with the application, or required by the LPA).
14. If the appeal is against the LPA's refusal or failure to decide an application because of a dispute over local list documentation, a copy of the letter sent to the LPA which explained why the document was not necessary and asked the LPA to waive the requirement that it be provided with the application.

K. OTHER APPEALS

Have you sent other appeals for this or nearby sites to us which have not yet been decided? Yes No

L. CHECK SIGN AND DATE

(All supporting documents must be received by us within the time limit)

I confirm that all sections have been fully completed and that the details are correct to the best of my knowledge.

I confirm that I will send a copy of this appeal form and supporting documents (including the full statement of case) to the LPA today.

Signature

MR JACK GANDY

Date

29/09/2022 11:28:00

Name

MR JACK GANDY

On behalf of

Cassel Hotels (Cambridge) Ltd

The gathering and subsequent processing of the personal data supplied by you in this form, is in accordance with the terms of our registration under the Data Protection Act 2018.

The Planning Inspectorate takes its data protection responsibilities for the information you provide us with very seriously. To find out more about how we use and manage your personal data, please go to our [privacy notice](#).

M. NOW SEND

Send a copy to the LPA

Send a copy of the completed appeal form and any supporting documents (including the full statement of case) not previously sent as part of the application to the LPA. If you do not send them a copy of this form and documents, we may not accept your appeal.

To do this by email:

- open and save a copy of your appeal form
- locating your local planning authority's email address:
<https://www.gov.uk/government/publications/sending-a-copy-of-the-appeal-form-to-the-council>
- attaching the saved appeal form including any supporting documents

To send them by post, send them to the address from which the decision notice was sent (or to the address shown on any letters received from the LPA).

When we receive your appeal form, we will write to you letting you know if your appeal is valid, who is dealing with it and what happens next.

You may wish to keep a copy of the completed form for your records.

N. APPEAL DOCUMENTS

We will not be able to validate the appeal until all the necessary supporting documents are received.

Please remember that all supporting documentation needs to be received by us within the appropriate deadline for the case type. Please ensure that any correspondence you send to us is clearly marked with the appeal reference number.

You will not be sent any further reminders.

The documents listed below were uploaded with this form:

Relates to Section:	FULL STATEMENT OF CASE
Document Description:	A copy of the full statement of case.
File name:	280922 Statement of Case A4.pdf
Relates to Section:	FULL STATEMENT OF CASE
Document Description:	A planning obligation (a section 106 agreement or a unilateral undertaking).
File name:	Draft Heads of Terms.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	01. A copy of the original application sent to the LPA.
File name:	21_00953_FUL - APPLICATION_FORM.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	03. A copy of the LPA's decision notice (if issued). Or, in the event of the failure of the LPA to give a decision, if possible please enclose a copy of the LPA's letter in which they acknowledged the application.
File name:	21_00953_FUL-DECISION_NOTICE.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	04. A site plan (preferably on a copy of an Ordnance Survey map at not less than 10,000 scale) showing the general location of the proposed development and its boundary. This plan should show two named roads so as to assist identifying the location of the appeal site or premises. The application site should be edged or shaded in red and any other adjoining land owned or controlled by the appellant (if any) edged or shaded blue.
File name:	Location Plan A4 A-846 06A.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	05.a. Copies of all plans, drawings and documents sent to the LPA as part of the application. The plans and drawings should show all boundaries and coloured markings given on those sent to the LPA.
File name:	09. Proposed Floor Plans_Ground and First A1 A-846 11A.pdf
File name:	08. Proposed Courtyard Elevations A1 A-846 22A.pdf
File name:	10. Proposed Floor Plans_Second and Roof A1 A-846 12A.pdf
File name:	12. Proposed Sections A1 A-846 24A.pdf
File name:	13. Landscape General Arrangement 11291 LD PLN 200 A Sheet 1 of 2.pdf
File name:	14. Landscape General Arrangement 11291 LD PLN 201 A Sheet 2 of 2.pdf
File name:	11. Proposed Main Elevations A1 A-846 21A.pdf
File name:	15. Planning Statement A4 February 2021.pdf
File name:	16. Statement of Community Involvement A4 Feb 2021.pdf
File name:	17. Care Home Needs Assessment A4 Dec 2020.pdf
File name:	18. A-846 P2 Design and Access Statement Part 1 19 Feb 21.pdf
File name:	18. A-846 P2 Design and Access Statement Part 2 19 Feb 21.pdf
File name:	18. A-846 P2 Design and Access Statement Part 3 19 Feb 21.pdf
File name:	18. A-846 P2 Design and Access Statement Part 6 19 Feb 21.pdf
File name:	18. A-846 P2 Design and Access Statement Part 4 19 Feb 21.pdf
File name:	18. A-846 P2 Design and Access Statement Part 7 19 Feb 21.pdf

File name: 18. A-846 P2 Design and Access Statement Part 5 19 Feb 21.pdf
File name: 20. LVA and GB Study Appendix2.pdf
File name: 20. Landscape Visual Appraisal and Green Belt Study Report Feb 21.pdf
File name: 27. Energy Strategy Report 1761 REP ES 01 Rev P1 Feb 21.pdf
File name: 23. Framework Travel Plan February 2021.pdf
File name: 20. LVA and GB Study Appendix4a.pdf
File name: 21. Health Impact Assessment February 2021.pdf
File name: 19. Heritage Statement Feb 2021.pdf
File name: 20. LVA and GB Study Appendix3.pdf
File name: 28. Utilities Statement 1761 REP US 01 Rev P1 Feb 21.pdf
File name: 22. Transport Statement February 2021.pdf
File name: 30. Water Conservation Statement 1761 REP WM 01 Rev P1 Feb21.pdf
File name: 29. Ventilation Statement 1761 REP VS 01 Rev P1 Feb 21.pdf
File name: 25. Phase 2 Site Investigation Report Jan 2021.pdf
File name: 20. LVA and GB Study Appendix4b.pdf
File name: 24. FRA and Drainage Strategy Feb 2021 Rev P3.pdf
File name: 32. Biodiversity Net Gain Report February 2021.pdf
File name: 33. Acoustic Assessment January 2021.pdf
File name: 31. Ecological Assessment October 2020.pdf
File name: 20. LVA and GB Study Appendix1.pdf
File name: 37. Existing Building Analysis.pdf
File name: 36. Sustainability Statement Rev C.pdf
File name: 34. Landscape Lighting Concept February 2021 Rev A RED.pdf
File name: 40. Phase One Desk Study - Appendix A Photographs.pdf
File name: 00. Covering Letter 19th Feb 2021.pdf
File name: 40. Phase One Desk Study - Appendix D E and F.pdf
File name: 01. Location Plan A4 A-846 06A.pdf
File name: 02. Existing Site Plan A1 A-846 05A.pdf
File name: 40. Phase One Desk Study - Appendix B Maps.pdf
File name: 07. Proposed Site Plan A1 A-846 04A.pdf
File name: 40. Phase One Desk Study - Appendix C -EnviroCheck.pdf
File name: 40. Phase One Desk Study Main Report - Dec 2020.pdf
File name: 03. Existing Elevations A1 A-846 23A.pdf
File name: 35. Archaeology AIA Part 2 Jan 2021.pdf
File name: 35. Archaeology AIA Part 3 Jan 2021.pdf
File name: 35. Archaeology AIA Part 1 Jan 2021.pdf
File name: 38. TS AIA AMS and TPP - 8100 - Hotel Felix.pdf
File name: 39. TS and AIA - 8100-D-AIA - Hotel Felix A1.pdf
File name: 06. Existing Roof Plan A1 A-846 15A.pdf
File name: 05. Existing First and Second Floor Plans A1 A-846 14A.pdf
File name: 04. Existing Basement and Ground Floor Plans A1 A-846 13A.pdf
File name: 26. Tree Survey A2 8100-D-CP April 2020.pdf

Relates to Section: SUPPORTING DOCUMENTS
Document Description: 05.b. A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA.
File name: List of original planning material sent to LPA.pdf

Relates to Section: SUPPORTING DOCUMENTS
Document Description: 05.(c) A list of all plans, drawings and documents upon which the LPA made their decision.
File name: List of additional plans and docs.pdf

Relates to Section: SUPPORTING DOCUMENTS
Document Description: 06.a. Copies of any additional plans, drawings and documents sent to the LPA but which did not form part of the original application (e.g. drawings for illustrative purposes).
File name: 50. Landscape GA 2 fo 2 11291-LD-PLN-201_B.pdf
File name: 44. Energy Strategy Report - Rev P2.pdf

File name: 47. TS AIA AMS and TPP - Hotel Felix - Rev A.pdf
File name: 45. Route of Ordinary Watercourse 1 of 2.pdf
File name: 49. Landscape GA 1 of 2 11291-LD-PLN-200_B.pdf
File name: 46. Route of Ordinary Watercourse 2 of 2.pdf
File name: 54. Headline Need Planning Stmt - Jan 2022.pdf
File name: 55. VSC Supplemental Report Oct 2021.pdf
File name: 41. TA Technical Note 2021-05-10.pdf
File name: 56. Health Impact Assessment - June 2021.pdf
File name: 52. Landscape Proposals V. 2.0.pdf
File name: 53. Landscape Proposals V. 4.0.pdf
File name: 57. Existing Building Presentation - May 2022.pdf
File name: 42. Supplementary Drainage Response.pdf
File name: 51. Proposed Site Plan A1 846-04B.pdf
File name: 43. Drainage GA A1 0001-P3.pdf
File name: 48. TS and AIA 8100-D-AIA - Hotel Felix- Rev A A1.pdf

Relates to Section: SUPPORTING DOCUMENTS

Document Description: 06.b. A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application.

File name: List of additional plans and docs.pdf

Relates to Section: SUPPORTING DOCUMENTS

Document Description: 07. A copy of the design and access statement sent to the LPA.

File name: 15. A-846 P2 Design and Access Statement A4 Part 3.pdf

File name: 15. A-846 P2 Design and Access Statement A4 Part 4.pdf

File name: 15. A-846 P2 Design and Access Statement A4 Part 5.pdf

File name: 15. A-846 P2 Design and Access Statement A4 Part 2.pdf

File name: 15. A-846 P2 Design and Access Statement A4 Part 1.pdf

File name: 15. A-846 P2 Design and Access Statement A4 Part 6.pdf

File name: 15. A-846 P2 Design and Access Statement A4 Part 7.pdf

Relates to Section: SUPPORTING DOCUMENTS

Document Description: 08. A copy of a draft statement of common ground.

File name: 280922 Draft Statement of Common Ground.pdf

Completed by MR JACK GANDY

Date 29/09/2022 11:28:00