

Inquiry Timetable Form

Appeal Reference CAS-02641-G8G7M5

1. All main parties in this appeal will have received a copy of this form. The purpose is to help establish a more realistic duration, to ensure the smooth running of the inquiry and to assist the appointed Inspector in their preparation of the case and a timetable or pre-inquiry note, if required. It is therefore **very important that you complete this form and return it to the PEDW Case Officer by the date requested**. After that date, should you become aware of any additional information which may affect the timetable or duration you **must** inform our case officer as soon as possible.
2. Please note that you **may** be liable to an **award of costs** against you if this form is not completed correctly or at all **and** this leads to an otherwise avoidable delay to the proceedings. Please note that Inspectors can initiate an award of costs against a party to the appeal in the absence of a costs application if they consider that there has been unreasonable behaviour.
3. **You will need to liaise with the other main parties in the appeal to complete some of the questions regarding cross-examination of each other's witnesses.**

A	Local Planning Authority / Appellant / Interested party (delete as appropriate)	Name: VCU Date completed as far as able: 25.02.25 and 10.03.25 re ecology witness
B Details of your representative/advocate Please provide details of the person speaking on your behalf. If you are not being represented by anyone else please provide your name and tick the final box "In person".		
Name of representative: Gethin Thomas of 39 Essex Chambers – Advocate (Barrister) Susan Ring of Goodenough Ring Solicitors (“GRS”) – Solicitor		<i>(please tick one)</i>
		Barrister <input type="checkbox"/> Solicitor <input type="checkbox"/> Agent <input type="checkbox"/> In Person <input type="checkbox"/>

C	<p>How long does your representative think they will spend on:</p> <p>i) opening submissions (i.e. introduction of the case) n.b. opening statements should ideally be no more than 5-10 minutes and preferably be handed out in writing at opening to save time.</p> <p>ii) closing submissions (i.e. summing up at the end)</p> <p>GRS: Please confirm that there will be an opportunity to put in written opening statements and closing statements; the pre-inquiry note does not appear to envisage written opening and closing statements, but given the nature of the issues in the appeal, our position is that it would be helpful to have these in writing as well as oral submissions. Please could you confirm the timetable for these.</p>	<p>i)TBC.....minutes</p> <p>ii)TBC.....minutes</p>			

D1	<p>Your witnesses Please supply details of all the witnesses that you intend to call, including whether they are an expert witness presenting technical evidence or an interested party, such as a neighbour; please delete the witness type as appropriate. You should briefly set out the matter(s) to be dealt with by each witness and, as accurately as possible, an indication of how long you estimate it will take them to give evidence.</p> <p>GRS: Given 1) that the Council was expected to call evidence on the putative reasons of refusal and it only became clear by about 21 January 2025 that they were not going to take part in the appeal; and 2) this document was sent to the client (and not the legal representative) asking for this to be completed within only 2 working days, despite our having asked for clarification of the procedure including a timetable and PIM since December 2024; and 3) the timetable for exchange of evidence only being provided to the parties on 24 February, VCU is not in a position to complete D1 today and has asked for an extension of time to 4 March 2025.</p>			
	Name of witness	Witness type (delete as appropriate)	Matter(s) to give evidence on	How long needed to give evidence
1	Emma Williams	Expert witness/ interested party	Biodiversity on site	
2		Expert witness/ interested party		
3		Expert witness/ interested party		

4		Expert witness/ interested party		
5		Expert witness/ interested party		
6		Expert witness/ interested party		
7		Expert witness/ interested party		
<i>Please continue on a separate sheet if necessary</i>				TOTAL time estimated

D2	Your cross-examination of the other party's witnesses You will need to liaise with the other party (including any Rule 6(6) parties) to find out who they intend to call as witnesses and on what matter(s) and then estimate how long you think you/your representative will need to cross-examine them. GRS: We cannot complete Part D2 on cross-examination of the other parties' witnesses as we don't have their evidence/names and won't until 13 March.		
	Name of witness	Matter(s) to give evidence on and whose witness (i.e. LPA/Appellant/Rule 6 party)	How long needed to cross examine
1			
2			
3			
4			
5			
6			

7			
<i>Please continue on a separate sheet if necessary</i>			TOTAL time estimated
E Do you know of any other party that may wish to be represented at the Inquiry e.g. local interest groups, residents associations, Parish Councils etc.			
	Name	Organisation (if applicable)	Address/contact details
1			
2			
3			
<i>Please continue on a separate sheet if necessary</i>			
F How long do you think the site visit is likely to take? GRS: This depends on the nature and extent of the evidence which is not due to be exchanged until 13 March.			
G In light of your answers above and discussions with the other party/ies do you consider that the currently allocated number of sitting days for the inquiry (including time for the site visit) is still appropriate? GRS: This depends on the nature and extent of the evidence, which is not due to be exchanged until 13 March.			
YES <input type="checkbox"/>		NO <input type="checkbox"/>	
If no, please provide a revised estimate: days			

Please add any other comments or information here: