N210PC

Statutory Review Acknowledgment of Service

Name and address of pe	erson to be served
Uttlesford District Counc	il
Council Offices, London Essex CB11 4ER	Road, Saffron Walden,

In the High Court of Justice Planning Court in the Administrative Court					
Claim No. CO/2356/2021					
Claimant(s) (including ref.)	Uttlesford District Council				
Defendant(s)	Secretary of State for Housing, Communities and Local Government				

SECTION A

Tick the appropriate box

- 1. I intend to contest all of the claim
- 2. I intend to contest part of the claim
- 3. I do not intend to contest the claim

- complete sections B, C, D, E and F
- complete section E and F

SECTION B

Insert the name and address of any person you consider should be added as a defendant.

name		name
address-		address-
Celephone no.	Fax no.	Telephone no.
-mail address		E-mail address

dress		
ephone no.		
	l un no.	



SECTION C

Summary of grounds for contesting the claim. If you are contesting only part of the claim, set out which part before you give your grounds for contesting it. The requirement to file and serve summary grounds of resistance in accordance with CPR Practice Direction 8C paragraph 5.5(a)(i) arises only where a party intends to contest a claim. As Stop Stansted Expansion do not intend to contest the claim, summary grounds of resistance have not been provided alongside this acknowledgment of service.

application notice is attached.			that a separate
application notice is attached.			
f you are seeking a direction that this matter be heard at an Administra	tive Court ven	ue other than that	at which the claim
was issued, you should complete, lodge and serve on all other parties	iorm in464 witi 	tnis acknowledge	ement of service.
ECTION E			
	∐ Yes	✓No	
o you deny that the claim is an Aarthus Convention claim?	Yes	✓No	y.
o you deny that the claim is an Aarthus Convention claim?	Yes	√No	jt.
o you deny that the claim is an Aarthus Convention claim?	Yes	V No	
o you deny that the claim is an Aarthus Convention claim?	Yes	☑No	.5
o you deny that the claim is an Aarthus Convention claim?	Yes	VNo	jt.
o you deny that the claim is an Aarthus Convention claim?	Yes	VNo	AT.
o you deny that the claim is an Aarthus Convention claim?	Yes	VNo),t
o you deny that the claim is an Aarthus Convention claim?	Yes	VNo).E
o you deny that the claim is an Aarthus Convention claim?	Yes	VNo).t
o you deny that the claim is an Aarthus Convention claim?	Yes	VNo).t
o you deny that the claim is an Aarthus Convention claim?	Yes	VNo	
o you deny that the claim is an Aarthus Convention claim?	Yes	VNo	
Po you deny that the claim is an Aarthus Convention claim? Yes, please set out your grounds for denial in the box below.	Yes	VNo	

SECTION	F			
*delete as appropriate	I believe the facts stated in this form are true. I underst proceedings for contempt of court may be brought again makes, or causes to be made, a false statement in a do verified by a statement of truth without an honest belief am duly authorised by Stop Stansted Expansion to sign	(If signing on behalf of firm or company, court or tribunal)	Position or office held————————————————————————————————————	
(To be signed by you or by your solicitor or litigation friend) Give an ac be sent to	ddress to which notices about this case can	•		2 August 2021 d counsel, please give their nam details below.
Stephanie	Butler	Richard W	ald QC	
Providence 141-145 F Ipswich IP1 1QJ		81 Chance London WC2A 1DI DX: Londo)	ry Lane 298
Telephone no		Telephone no.		Fax no.

Completed forms, together with a copy should be lodged with the Planning Court in the Administrative Court Office (court addresses below) in which this claim was issued **within**21 days of the service of the claim upon you, and further copies should be served on the Claimant(s) and any other Defendant(s) within 7 days of lodgement with the Court.

Administrative Court addresses

• Administrative Court in London

Administrative Court Office, Room C315, Royal Courts of Justice, Strand, London, WC2A 2LL.

Administrative Court in Birmingham

Administrative Court Office, Birmingham Civil Justice Centre, Priory Courts, 33 Bull Street, Birmingham B4 6DS.

Administrative Court in Wales

Administrative Court Office, Cardiff Civil Justice Centre, 2 Park Street, Cardiff, CF10 1ET.

Administrative Court in Leeds

Administrative Court Office, Leeds Combined Court Centre, 1 Oxford Row, Leeds, LS1 3BG.

Administrative Court in Manchester

Administrative Court Office, Manchester Civil Justice Centre, 1 Bridge Street West, Manchester, M3 3FX.

Printroom

From:

Elizabeth Smith

Sent:

02 August 2021 16:59

To:

Robert Cant

Subject:

Fwd: [External] CO/2356/2021: Uttlesford District Council v SSHCLG

Attachments:

210802 AoS.pdf; 210802 Statement of costs.pdf; 210802 Summary grounds of

defence.pdf

Yet more printing.

Elizabeth

Elizabeth Smith
Uttlesford District Council
Get <u>Outlook for iOS</u>

From: Elizabeth Smith

Sent: Monday, August 2, 2021 4:56 pm **To:** Philip Coppel; Asitha Ranatunga

Subject: Fwd: [External] CO/2356/2021: Uttlesford District Council v SSHCLG

hi

Central Govt.

So far you have had NSC and SSE.

My mistake

Elizabeth

Elizabeth Smith
Uttlesford District Council
Get <u>Outlook for iOS</u>

From: Mark Colautti

Sent: Monday, August 2, 2021 4:25:27 PM

To: 'Ricardo Gama'

Cc: Claire Jones

Subject: [External] CO/2356/2021: Uttlesford District Council v SSHCLG

Dear Colleagues

We attach, by way of service, the following documents filed this afternoon:

- 1. Acknowledgment of service form
- 2. Summary grounds of defence
- 3. Statement of costs

Regards

Mark Colautti

Lawyer (Australian Qualified)

Planning, Infrastructure and Environment Team

Justice and Development Division

Litigation Group, Government Legal Department

102 Petty France, Westminster, London SW1H 9GL Telephone:

GLD accepts service by email. See https://www.gov.uk/government/organisations/government-legal-department Due to COVID-19 and the current circumstances I would appreciate any documentation being sent by e-mail rather than by post to limit the handling of materials

The information in this e-mail belongs to HM Government and may be confidential or otherwise protected by law. If you received it in error, we request that you inform us by return e-mail and then delete it immediately, without printing, copying or disseminating it.

The original of this email was scanned for viruses by Government Secure Intranet (GSi) virus scanning service supplied by Vodafone in partnership with MessageLabs. HM Government does not however warrant that it is virus free at point of delivery.



Our Ref:

SBU/327490.0003

Your Ref:

Date:

29 July 2021

Uttlesford District Council Council Offices London Road Saffron Walden CB10 4ER

Also by email:

Birketts LLP Providence House 141-145 Princes Street Ipswich Suffolk IP1 10]

T: +44 (0)1473 232300 F: +44 (0)1473 230524 DX: 3206 Ipswich E: mail@birketts.co.uk

www.birketts.co.uk

Dear Sirs

Our client:

Stop Stansted Expansion

Regarding:

Proposed 2 Week Extension to the Interested Parties'

Acknowledgement of Service Filing Date in Uttlesford

DC v SSHCLG & Ors

We enclose, by way of service, our client's sealed application.

Yours faithfully



Birketts LLP

Direct Line: Direct e-mail:



Cambridge, Chelmsford, London and Norwich





N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

Name of court		Claim no.
High Court of Just		CO023562021
Planning Court in	the	
Administrative Cou	rt	
Fee account no. (if applicable)	Help with Fe	
	HWF	I WANT
Warrant no. (if applicable)		* 22 JUL 2021
Claimant's name (including		(B)
Uttlesford District	t Council	LONDON
		LONDON
Uttlesford District	ng ref.)	WSTRATIVE CO
Uttlesford District Defendant's name (including)	ng ref.) for Housi	WSTRATIVE CO
Uttlesford District Defendant's name (including Secretary of State	ng ref.) for Housi	WSTRATIVE CO

١.	what is your name or, if you are a legal representative, the name	at is your name or, if you are a legal representative, the name of your firm?	
	Birketts LLP		
2.	Are you a Claimant Defendant	X Legal Representative	
	Other (please specify)		
	If you are a legal representative whom do you represent?	Stop Stansted Expansion (Interested Party)	
3.	What order are you asking the court to make and why?		
	The deadline for the Interested Parties to file shall be extended by two weeks, in accordance was management powers under CPR 3.1(2)(a)	their Acknowledgements of Service th the court's general case	
4.	Have you attached a draft of the order you are applying for?	X Yes No	
5.	How do you want to have this application dealt with?	at a hearing X without a hearing	
		at a telephone hearing	
6.	How long do you think the hearing will last?	Hours Minutes	
	Is this time estimate agreed by all parties?	Yes No	
7.	Give details of any fixed trial date or period	NA	
8.	What level of Judge does your hearing need?	NA	
9.	Who should be served with this application?	All parties, including interested parties	

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

ĺ	Stansted Airport Limited Town Legal LLP
ı	10 Throgmorton Avenue
	EC2N 2DL
	Group for Action on Leeds Bradford Airport (GALBA):
	Bristol Airport Action Network (BAAN):
	North Somerset Council
	Head of Legal Services Town Hall
	Walliscote Grove Road
	Weston-Super-Mare BS23 1UJ
	D323 IUU

10. What information will you be relying on, in support of your application?
the attached witness statement
the statement of case
X the evidence set out in the box below

If necessary, please continue on a separate sheet.

This claim was filed and served earlier this month.

According to paragraph 5.3(a) of Practice Direction 8C of the Civil Procedure Rules, Acknowledgements of Service must be filed no later than 21 days after service of the claim.

No pre-action correspondence was conducted before the claim was filed. Therefore, the parties did not have the opportunity to narrow issues and focus grounds to the benefit of the Court.

I have written to the Claimant, Defendant, and all Interested Paties ("IPs") named on the claim form, on the applicant's behalf. In those letters, I stated the applicant's belief that the claim was served on the Defendant and IPs on 8 July 2021. I informed the Claimant, Defendant, and IPs that the applicant wished to apply to court for a two-week extension for the IPs to file Acknowledgments of Service.

There is only one objector to the application, namely Stansted Airport Limited which is one of the Interested Parties. Stansted Airport Limited has not addressed the underlying reasons for the application or the obvious benefits it would offer to whichever judge considers the paper application for permission.

The Claimant and Defendant have confirmed in writing that they will not oppose this application. The Defendant mentioned, in their written response, that they consider that the deadline for filing their Acknowledgement of Service is 2 August 2021, taking into account the deemed service provision under CPR 6.14.

GALBA, one of the IPs, has confirmed in writing that they strongly support this application.

Copies of the letters that I have sent to the other parties in connection with this application, and the responses I have received, are annexed to this application at Annexure 1.

I therefore respectfully request that, in accordance with the court's general case management powers under CPR 3.1(2)(a), and in the interest of furthering the Court's overriding objective under CPR 1.1 to deal with cases justly and at proportionate cost, all IPs be allowed a two-week extension of time to file their Acknowledgements of Service. This will afford the IPs a two-week period to consider the Defendant's grounds before filing their Acknowledgements of Service.

Application Notice	Page 5 of 2

Statement of Truth

brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.
I believe that the facts stated in section 10 (and any continuation sheets) are true.
The Applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.
Signature
Applicant
Litigation friend (where applicant is a child or a Protected Party)
Applicant's legal representative (as defined by CPR 2.3(1))
Date
Day Month Year 21 July 2021
Full name
Stephanie Jane Butler
Name of applicant's legal representative's firm
Birketts LLP
If signing on behalf of firm or company give position or office held
Solicitor

I understand that proceedings for contempt of court may be

Your Ref.

Email

SBU/327490.3

Stephanie-Butler@birketts.co.uk

Applicant's address to which documents should be sent. **Building and street** Providence House Second line of address 141-145 Princes Street Town or city Ipswich County (optional) Suffolk Postcode 1^{1} If applicable Phone number Fax number DX number DX 3206 IPSWICH



IN THE HIGH COURT OF JUSTICE

Case Reference:

CO023562021

PLANNING COURT IN THE ADMINISTRATIVE COURT

BETWEEN:

UTTLESFORD DISTRICT COUNCIL

Claimant

and

THE SECRETARY OF STATE FOR HOUSING, COMMUNITIES AND LOCAL GOVERNMENT

Defendant

and

- (1) STANSTED AIRPORT LIMITED
- (2) STOP STANSTED EXPANSION
- (3) NORTH SOMERSET COUNCIL
- (4) BRISTOL AIRPORT ACTION NETWORK
- (5) GROUP FOR ACTION ON LEEDS BRADFORD AIRPORT

Interested Parties

ANNEXURE TO APPLICATION

This is the annexure referred to in the application of Stop Stansted Expansion dated 21 July 2021.

Our Ref:

SBU/327490.0003

Your Ref:

Date:

19 July 2021

Uttlesford District Council Council Offices London Road Saffron Walden **CB10 4ER**

Birketts LLP 22 Station Road Cambridge CB1 2JD

T:+44 (0)1223 326600 F;+44 (0)1223 326629 DX:131969 Cambridge 6

www.birketts.co.uk

Also by email:

Dear Sirs

Our client: Regarding: Stop Stansted Expansion ("SSE")

Proposed 2 Week Extension to the Interested Parties' Acknowledgement of

Service Filing Date in Uttlesford DC v SSHCLG & Ors

We write in order to seek agreement to what we hope you will agree is a constructive procedural change to the filing date for all Interested Parties ("IP")s' Acknowledgment of Service ("AoS").

The Claimant served this claim on the Defendant and IPs on 8 July, 2021. According to paragraph 5.3(a) of Practice Direction 8C of the Civil Procedure Rules AoS's must therefore be filed by 30 July, 2021, i.e. by no later than 21 days after service.

In cases in which there has been pre-action correspondence between a claimant and a defendant, IPs filing an AoS would be able to focus their summary grounds on the issues which exist between those parties as would be apparent on the face of that correspondence. Clearly this has the advantage of providing the parties with the opportunity to narrow issues and focus grounds to the benefit of the Court. That opportunity is absent in this claim where no pre-action correspondence was conducted before the claim was filed. We therefore suggest that all IPs be afforded a two week period to consider the Defendant's grounds before filing AoSs (i.e. by no later than 13 August, 2021).

It is acknowledged that according to paragraph 5.4 of Practice Direction 8C of the Civil Procedure Rules, "The time limits ... [for the filing of an AoS] may not be extended by agreement between the parties" and for this reason SSE intends to apply to the Court for permission for this suggestion early this week. The Court will however no doubt wish to know the position of other parties when determining this application, hence this letter.

We should be most grateful if you would be kind enough to let us know whether your client agrees to the proposed two week extension for IP AoS filing by no later than 12pm noon on Tuesday 20 July.

Yours faithfully

Direct Line: Direct e-mail:

38110940.V1 Let to x 327490.0003 19/07/2021

Odices also in: Chelmsford, Ipswich and Norwich

Birketts LLP is registered in England under no. OC317545 and authorised and regulated by the Solicitors Regulation Authority no. 441849.
Registered office at: Providence House, 141-145 Princes Street, Ipswich, Suffolk, IP1 [O].
A list of members may be inspected at any of our offices. The term "Partner" is used to refer to a member of Birketts LLP.





Our Ref:

SBU/327490.0003

Your Ref:

Date:

19 July 2021

The Treasury Solicitor (Planning) 102 Petty France Westminster London SW1H 9GL

Also by email:

Birketts LLP 22 Station Road Cambridge CB1 2JD

T:+44 (0)1223 326600 F:+44 (0)1223 326629 DX:131969 Cambridge 6

www.birketts.co.uk

Dear Sirs

Our client:

Stop Stansted Expansion ("SSE")

Regarding:

Proposed 2 Week Extension to the Interested Parties' Acknowledgement of

Service Filing Date in Uttlesford DC v SSHCLG & Ors

We understand that you represent the Secretary of State for Housing, Communities and Local Government in the above matter.

We write in order to seek agreement to what we hope you will agree is a constructive procedural change to the filling date for all Interested Parties ("IP")s' Acknowledgment of Service ("AoS").

The Claimant served this claim on the Defendant and IPs on 8 July, 2021. According to paragraph 5.3(a) of Practice Direction 8C of the Civil Procedure Rules AoS's must therefore be filed by 30 July, 2021, i.e. by no later than 21 days after service.

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It is acknowledged that according to paragraph 5.4 of Practice Direction 8C of the Civil Procedure Rules, "The time limits ... [for the filing of an AoS] may not be extended by agreement between the parties" and for this reason SSE intends to apply to the Court for permission for this suggestion early this week. The Court will however no doubt wish to know the position of other parties when determining this application, hence this letter.

We should be most grateful if you would be kind enough to let us know whether your client agrees to the proposed two week extension for IP AoS filing by no later than 12pm noon on Tuesday 20 July.

Yours faithfully

Dillions FFI

Direct Line:

Direct e-mail:

38111108.V1 Let to Defendant

327490,0003 19/07/2021

Offices also in: Chelmsford, Ipswich and Norwich

Birketts LLP is registered in England under no. OC317548 and authorised and regulated by the Solicitors Regulation Authority no. 441849, Registered office at: Providence House, 141-148 Princes Street, Ipswich, Sulfolk, IP1 1Qf. A list of members may be inspected at any of our offices: The term: Partner' is used to refer to a member of Birketts LLP.





Our Ref:

SBU/327490.0003

Your Ref:

Date:

19 July 2021

Stansted Airport Limited Enterprise House Bassingbourn Road Stansted Airport Essex, CM24 1QW

Birketts LLP 22 Station Road Cambridge CBI 21D

T:+44 (0)1223 326600 F:+44 (0)1223 326629 DX:131969 Cambridge 6

www.birketts.co.uk

Also by email:

Dear Sirs

Our client:

Stop Stansted Expansion ("SSE")

Regarding:

Proposed 2 Week Extension to the Interested Parties' Acknowledgement of

Service Filing Date in Uttlesford DC v SSHCLG & Ors

We write in order to seek agreement to what we hope you will agree is a constructive procedural change to the filing date for all Interested Parties ("IP")s' Acknowledgment of Service ("AoS").

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It is acknowledged that according to paragraph 5.4 of Practice Direction 8C of the Civil Procedure Rules, "The time limits ... [for the filing of an AoS] may not be extended by agreement between the parties" and for this reason SSE intends to apply to the Court for permission for this suggestion early this week. The Court will however no doubt wish to know the position of other parties when determining this application, hence this letter.

We should be most grateful if you would be kind enough to let us know whether your client agrees to the proposed two week extension for IP AoS filing by no later than 12pm noon on Tuesday 20 July.

RILKELLS LFL

Direct Line: Direct e-mail:

38115430.V1 Let to airport 327490.0003 19/07/2021

Offices also in Chelmsford, Ipswich and Norwich

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Registered office at: Providence House, 141-145 Princes Street, Ipswich, Suffolk, IP1 1QJ.
A list of members may be inspected at any of our offices. The term "Partner" is used to refer to a member of Birketts LLP.





Our Ref:

SBU/327490.0003

Your Ref:

Date:

19 July 2021

Group for Action on Leeds Bradford Airport (GALBA)

Birketts LLP 22 Station Road Cambridge CB1 2TD

T:+44 (0)1223 326600 F:+44 (0)1223 326629 DX:131969 Cambridge 6

www.birketts.co.uk

By email only:

Dear Sirs

Our client:

Stop Stansted Expansion ("SSE")

Regarding:

Proposed 2 Week Extension to the Interested Parties' Acknowledgement of

Service Filing Date in Uttlesford DC v SSHCLG & Ors

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It is acknowledged that according to paragraph 5.4 of Practice Direction 8C of the Civil Procedure Rules, "The time limits ... [for the filing of an AoS] may not be extended by agreement between the parties" and for this reason SSE intends to apply to the Court for permission for this suggestion early this week. The Court will however no doubt wish to know the position of other parties when determining this application, hence this letter.

We should be most grateful if you would be kind enough to let us know whether your client agrees to the proposed two week extension for IP AoS filing by no later than 12pm noon on Tuesday 20 July.

Voura faithfullu

BILKELLS LTL

Direct Line: Direct e-mail:

38111624.V1 Let to GALBA 327490.0003 19/07/2021

Offices also in: Chelmsford, Ipswich and Norwich

Bicketts LLP is registered in England under no. OC317845 and authorised and regulated by the Solicitors Regulation Authority no. 441849. Registered office at: Providence House, 141-145 Princes Street, Ipswich, Sulfolk, IFI 1QJ. A list of members may be inspected at any of our offices. The term "Partner" is used to refer to a member of Birketts LLP.





Our Ref:

SBU/327490.0003

Your Ref:

19 July 2021

Bristol Airport Action Network (BAAN)

Birketts LLP 22 Station Road Cambridge CB1 2]D

T:+44 (0)1223 326600 F:+44 (0)1223 326629 DX:131969 Cambridge 6

www.birketts.co.uk

By email only:

Dear Sirs

Our client:

Stop Stansted Expansion ("SSE")

Regarding:

Proposed 2 Week Extension to the Interested Parties' Acknowledgement of

Service Filing Date in Uttlesford DC v SSHCLG & Ors

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We should be most grateful if you would be kind enough to let us know whether your client agrees to the proposed two week extension for IP AoS filing by no later than 12pm noon on Tuesday 20 July.

Yours faithfully

Birketts LLP Direct Line: Direct e-mail:

38111546.V1 Let to BAAN 327490.0003 19/07/2021

Offices also in Chelmsford, Ipswich and Norwich

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Registered office at: Providence House, 141-145 Princes Streat, Spawich, Sulfolk, IP1 (Q).
A list of members may be inspected at any of our offices. The term "Partner" is used to refer to a member of Birketts LLP.





Our Ref:

SBU/327490.0003

Your Ref:

Date:

19 July 2021

North Somerset Council Head of Legal Services Town Hall Walliscote Grove Road Weston-Super-Mare BS23 1UJ Birketts LLP 22 Station Road Cambridge CB1 2JD

T:+44 (0)1223 326600 F:+44 (0)1223 326629 DX:131969 Cambridge 6

www.birketts.co.uk

Dear Sirs

Our client:

Stop Stansted Expansion ("SSE")

Regarding:

Proposed 2 Week Extension to the Interested Parties' Acknowledgement of

Service Filing Date in Uttlesford DC v SSHCLG & Ors

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Yours faithfully

Direct Line:
Direct e-mail:
38111371.V1 Let to IP

Offices also in Chelmsford, Ipswich and Norwich

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From:

Elizabeth Smith

Sent:

19 July 2021 15:29 Stephanie Butler

To: Subject:

Uttlesford District Council v Secretary of State for Housing, Communities and Local

Government and Others

*** External Email - THINK - Do you trust this email? ***

Dear Ms Butler

Uttlesford District Council v Secretary of State for Housing, Communities and Local Government and Others – case no CO/2356/2021

I refer to your letter of today's date regarding the above, sent by email, and note that your firm is instructed by SSE in this matter.

I have taken my client's instructions and confirm that the Council would not oppose your application.

I have not yet received any response from the Treasury Solicitor, but for your information should add that STAL intend to instruct Town Legal and North Somerset Council have instructed their in-house solicitors. The Indications are that neither GALBA nor BAAN will be playing an active role in the proceedings.

Yours sincerely

Elizabeth Smith

Elizabeth Smith Uttlesford District Council Council Offices London Road Saffron Walden Essex CB10 4ER

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From:

GALBA

Sent:

19 July 2021 20:15

To:

Stephanie Butler

Subject:

Proposed 2 Week Extension to the Interested Parties' Acknowledgement of service

Filing Date in Uttlesford DC v SSHCLG &Ors

*** External Email - THINK - Do you trust this email? ***

Dear Sirs

Thank you for your letter of 19 July 2021 seeking our views regarding your proposed application to the Court for a two-week extension for all Interested Parties to file their AoSs in Uttlesford DC's statutory appeal. We strongly support that application, both for the reasons you give and because the extra time will allow for discussion (already begun, but not concluded) which is needed to focus and streamline responses, with the potential for some IPs to put forward joint responses, thereby saving court time and resources.

Yours sincerely

Chris Foren Chair of GALBA

Sent with ProtonMail Secure Email.



Stephanie Butler Birketts LLP 22 Station Street Cambridge CB1 2JD

Litigation Group 102 Petty France Westminster London SW1H 9GL

T 020 7210 3000

DX 123243, Westminster 12 www.gov.uk/gld

Your ref: SBU/327490.0003

Our ref:

Z2109041/MKC/JD3

20 July 2021

Dear Ms Butler

Uttlesford District Council v Secretary of State for Housing, Communities and Local Government (CO/2356/2021)

We act for the Secretary of State for Housing, Communities and Local Government in the above proceeding.

We refer to your letter dated 19 July 2021, in which you have:

- Confirmed that your client will make an application for a 2-week extension of time for it and any other interested parties to file an Acknowledgment of Service ("AoS").
- Requested our client's agreement to the extension.

Our client takes a neutral positon in respect of the proposed application. We do however make the following observations:

- We agree that the parties are unable to agree to an extension of time due to Practice Direction 8C (paragraph 5.4).
- It is possible that the parties will make submissions to the effect that the proceeding should be categorised as a "Significant Planning Court claim" under which accelerated target dates apply to various stages in the proceeding. If so, the proposed application may materially impact the Court's capacity to meet those target dates.
- The other parties to the proceeding have not been copied to your correspondence, notwithstanding that the proposed application will affect their interests. We presume you have written to them separately and/or that they will have notice of the application, however please confirm whether this is the case.

For the avoidance of doubt, we confirm that our client's AoS is due on 2 August 2021, taking into account the deemed service provision under CPR 6.14.

Gilad Segal - Head of Division Gary Howard - Deputy Director, Team Leader Planning, Infrastructure & Environment







Please contact Mark Colautti if you have any queries.

Yours sincerely



Mark Colautti For the Treasury Solicitor



Stephanie Butler Birketts LLP 22 Station Road Cambridge CB1 2JD

10 Throgmorton Avenue London EC2N 2DL

townlegal.com

T: 020 3893 0370 D: 020 3893 0384

E: simon.ricketts@townlegal.com

By email

Your ref:

SBU/327490.0003

Our ref:

STA004/0001/sr

20 July 2021

Dear Sirs

Our client:

Stansted Airport Limited

Regarding:

Proposed 2 Week Extension to the Interested Parties AoS Filing Date in Uttlesford DC c

SSHCLG & Ors

We write in response to your letter of 19 July 2021 regarding the above.

Our client has reviewed your client's proposal in your letter for a two week extension as above. In our client's view, the current filing deadline of 30 July 2021, in the circumstances, is sufficient and appropriate for all parties concerned. Accordingly, our client considers that there is no proper basis for the requested extension.

We note your comments in your letter of 19 July 2021 that your client intends to apply to the Court for your proposed extension. For the avoidance of doubt, our client opposes the proposed extension, and we request please that you bring this to the Court's attention in your application to the Court.

Yours faithfully

Town Legal LLP



IN THE HIGH COURT OF JUSTICE

Case Reference: CO023562021

PLANNING COURT IN THE **ADMINISTRATIVE COURT**

BETWEEN:

UTTLESFORD DISTRICT COUNCIL

Claimant

and

THE SECRETARY OF STATE FOR HOUSING, COMMUNITIES AND LOCAL GOVERNMENT

Defendant

and

- (1) STANSTED AIRPORT LIMITED
- (2) STOP STANSTED EXPANSION
- (3) NORTH SOMERSET COUNCIL
- (4) BRISTOL AIRPORT ACTION NETWORK
- (5) GROUP FOR ACTION ON LEEDS BRADFORD AIRPORT

Interested Parties

1

DRAFT ORDER

UPON considering the application and annexure of the Second Interested Party dated 21 July 2021

AND UPON considering the covering letter accompanying this draft order

IT IS ORDERED THAT:

38091139,V1 Draft order for extension of time 327490.0003 16/07/2021

 The deadline for the interested parties in these proceedings to file their Acknowledgements of Service shall be extended by 14 days.

2. Costs in the case.

Dated: