

██████████
32, HANOVER COURT
Cambridge CB2 1JH

Email: ██████████

Tel: ██████████

22nd April 2026

Planning Casework Unit
Ministry of Housing, Communities and Local Government
23 Stephenson Street
Birmingham B2 4BH
By email: pcu@communities.gov.uk
By Royal Mail Signed For

Dear Sir or Madam,

**OBJECTION TO THE CAMBRIDGE CITY COUNCIL (HANOVER COURT
AND PRINCESS COURT) COMPULSORY PURCHASE ORDER 2026**

I write to object, within the statutory period, to the above compulsory purchase order ("the Order").

I am a qualifying person for the purposes of section 12(2) of the Acquisition of Land Act 1981 by reason of my leasehold interest in 32 Hanover Court. My objection is a relevant objection and, if not withdrawn, will be a remaining objection for the purposes of section 13A of the 1981 Act.

I do not consent to the written representations procedure. I formally request that a public local inquiry be held.

My details

- Name: ██████████
- Address for correspondence: Property affected: 32, Hanover Court, Cambridge CB2 1JH, being my leasehold interest
- Status: Resident owner-occupier. This property is my main residence and has been so for over twenty years – initially as the occupier and became the owner-occupier after I purchased it from Cambridge City Council under the Right to Buy scheme on 22nd May 2012

Preliminary

I do not object to the principle of regeneration on this site. I object to the making and confirmation of this Order (at this stage and on the present basis) on the specific grounds set out below. The level of compensation is not a ground of objection at this

stage — as I understand, matters going to the level of compensation fall to be determined separately, if necessary by reference to the Upper Tribunal (Lands Chamber). My rights in that respect are expressly reserved.

Grounds of objection

1. The acquiring authority has not demonstrated that there are sufficiently compelling reasons to seek compulsory purchase powers at this stage

The Government Guidance on the Compulsory Purchase Process (January 2025) requires an acquiring authority to demonstrate that there are sufficiently compelling reasons for powers to be sought at the time the Order is made and confirmed, and that there are no obvious impediments to implementation within a reasonable timescale. In this case, as I understand it, planning permission for the redevelopment scheme has not yet been granted. The planning application remains undetermined. An undetermined planning application is a material impediment. Until planning permission has been granted, there is no sufficient basis for the Secretary of State to conclude that the scheme will in fact proceed, and therefore no sufficient basis to override property rights by way of compulsory acquisition at this stage. Confirming the Order in advance of the planning decision would, in my respectful submission, be premature.

2. Insufficiently demonstrated public interest and disproportionality in this individual case

While I acknowledge that the Council asserts a housing-led public interest case, the existence of public benefits in the abstract is not enough. The relevant question is whether, on the facts of this case, there is a compelling case for overriding my rights as a resident owner-occupier at this stage. That scrutiny is especially important where the acquisition is intended to facilitate onward delivery through a development partnership involving a private sector housebuilder. In my submission, the Council has not demonstrated that the interference with my rights is proportionate at this stage, given that planning permission remains undetermined, the practical operation of the asserted “right of return” has not been secured in my case, and the mitigation and compensation arrangements do not yet place me in an equivalent position.

3. The acquiring authority has failed to apply its own published Regeneration Policy consistently, and has failed to offer adequate mitigation for the impact on me

Cambridge City Council's published Regeneration Policy commits the Council to offering a right of return, through shared equity or shared ownership where necessary, to leaseholders and freeholders displaced by CPO-driven regeneration schemes. The Council expressly confirmed the application of this policy to residents of the Ekin Road estate in its decision and press release of June 2024, which stated that "Leaseholders and freeholders also have a right to return once the estate has been redeveloped" and that "consideration will be given to a shared equity option for

displaced leaseholders and freeholders where this would make their return possible financially."

Despite repeated requests, the Council has refused to offer me a satisfactory or workable right of return and has not explained in writing why my circumstances are materially different from those of residents at Ekin Road. In accordance with the principle recognised in *R v North and East Devon Health Authority ex parte Coughlan* [2001] QB 213, a public authority cannot depart from a published policy that gives rise to a legitimate expectation without good reason. The Council's refusal to apply its own policy to me is a material matter going to whether the Order should be confirmed, and the absence of meaningful mitigation materially increases the interference with my rights.

4. The Order would amount to a disproportionate interference with my rights under the European Convention on Human Rights

The Order engages my rights under Article 8 (respect for home and private and family life) and Article 1 of the First Protocol (peaceful enjoyment of possessions) of the European Convention on Human Rights, given effect in domestic law by the Human Rights Act 1998. I have lived in this property as my main home for over twenty years. I have established community ties and practical arrangements that are rooted in this specific central Cambridge location. The replacement housing market in this part of Cambridge is materially different from the ex-council leasehold market, and the interference proposed by the Order is permanent and irreversible.

The Secretary of State's decision of September 2016 in relation to the Aylesbury Estate compulsory purchase order (London Borough of Southwark) established that, in the context of estate regeneration, compensation and mitigation arrangements that fail to allow long-term resident leaseholders to remain in their area may constitute a disproportionate interference with Convention rights. The same considerations apply here. Without proper mitigation and a deliverable right of return — which the Council has declined to provide — the interference with my rights is disproportionate to the public interest pursued by the Order.

5. The acquiring authority has not taken reasonable steps to acquire my interest by agreement

Paragraph 2 of the Government Guidance on the Compulsory Purchase Process (January 2025) requires an acquiring authority to demonstrate that "reasonable steps have been taken to acquire all of the land and rights included in the Order by agreement." Compulsory acquisition is expressly to be treated as a last resort. In my case, the Council has refused to engage on the application of its own Regeneration Policy to my situation and has failed to address the practical reality that replacement accommodation in this area is not available within the valuation basis proposed. I have engaged constructively throughout; the Council has not reciprocated in a manner that could properly be described as reasonable steps to acquire by agreement.

6. My individual circumstances warrant specific scrutiny

The grounds above apply to the Order generally, but I wish to draw particular attention to my own circumstances as a long-term resident owner-occupier. I have lived in this property for over twenty years. I currently frequently travel abroad to care for an elderly and frail parent. These circumstances place me in a position that the acquiring authority's standard approach has not adequately addressed, including in relation to timing, continuity of housing, and the practical ability to secure replacement accommodation within Cambridge. The individualised impact of this Order on me is a proper matter for inquiry.

Request for public local inquiry

I am a "qualifying person" within the meaning of section 13A of the Acquisition of Land Act 1981 and a "remaining objector" in relation to this Order. I do not consent to the written representations procedure. I request that a public local inquiry be held pursuant to section 13A. I wish to appear at the inquiry and to give evidence, whether in person or through a representative in due course.

Reservation of rights

I note that objections relating to the level of compensation fall outside the matters properly considered at a CPO inquiry. My rights in respect of the level, heads, and assessment of compensation are expressly reserved and, if necessary, will be pursued through a separate reference to the Upper Tribunal (Lands Chamber).

All my other rights are expressly reserved, including (without limitation): the right to apply to the High Court under section 23 of the Acquisition of Land Act 1981 within six weeks of confirmation of the Order; the right to pursue judicial review of any decision by the Council to depart from its published Regeneration Policy without good reason; and the right to rely on any further grounds or evidence that may emerge in the course of the procedure.

Procedural requests

Please treat this letter as a formal objection. I would be grateful for:

- (a) written confirmation that this objection has been received in time;
- (b) notification of the next procedural steps, including the "relevant date" under the Compulsory Purchase (Inquiries Procedure) Rules 2007;
- (c) copies of any timetable and directions issued in relation to the consideration of this Order; and
- (d) a copy of the acquiring authority's Statement of Case when served.

All future correspondence in connection with the Order should be sent to the postal address and email address at the head of this letter. I may be assisted by professional advisers in due course, and their contact details will be provided at that stage.

Yours sincerely,

██████████

Signature:

Resident owner-occupier, 32, Hanover Court, Cambridge

*Copy to:
The Chief Executive
Cambridge City Council
The Guildhall
Market Square
Cambridge CB2 3QJ
(as acquiring authority)*