PLANMORE DESIGN ARCHITECTURE 960 Capability Green Luton LU1 3PE
18 May 2026

The Planning Inspectorate Temple Quay House 2 The Square Bristol BS1 6PN

By online portal submission

Dear Sir or Madam,

Appeal under Section 195 of the Town and Country Planning Act 1990

Appellant: Mr Ghulam Khan Site: Alderlands, James Road, Crowland, Spalding, Lincolnshire PE6 0AA LPA: South Holland District Council LPA Reference: H02-0058-26 LPA Decision Date: 13 March 2026

I write on behalf of Mr Ghulam Khan to lodge an appeal under Section 195 of the Town and Country Planning Act 1990 against the refusal by South Holland District Council of an application for a Certificate of Lawful Use or Development (Existing) made under Section 191 of the Act.

The appeal is accompanied by the following documents:

Completed PINS Appeal Form
Statement of Case
Evidence bundle (Appendices A to P, as listed in the Statement of Case)
The Appellant requests that the appeal be determined by way of **Written Representations**. The issues are primarily legal in nature, the relevant evidence is documentary, and the matter is suitable for paper determination.
The Appellant reserves the right to supply supplementary evidence during the statutory evidence period, including the Schedule 2 plan referenced in the 1993/1994 Certificate of Lawful Use (H02/1113/93) which has been requested from South Holland District Council under the Environmental Information Regulations 2004, together with operational detail concerning the current vehicle-storage use.

The Appellant additionally reserves the right to make an application for an award of costs at the conclusion of these proceedings.

All correspondence in connection with this appeal should be directed to the agent at the address above, with email correspondence to admin@planmore.co.uk.

Yours faithfully,

Ali Yasin For and on behalf of Mr Ghulam Khan Planmore Design Architecture