

APPEAL REF: APP/B3438/W/24/3351035

Outline application for residential development with access considered
(all other matters reserved)

Land east of Froghall Road, Cheadle, Staffordshire**Case Management Conference to be held online at
10.00 on Monday 2 December 2024****INSPECTOR'S PRE-CONFERENCE NOTE**

1. The case management conference will be led by the Inquiry Inspector, Andrew Parkin, a chartered town planner. Attached as separate documents are instructions for joining the conference, conference etiquette to be observed, and the conference agenda.
2. There will be no discussion as part of the conference as to the merits of your respective cases and the Inspector will not hear any evidence. Rather the purpose is to set out a clear indication as to the ongoing management of this case and the presentation of evidence, so that the forthcoming Inquiry is conducted in an efficient and effective manner.
3. The Inquiry itself is scheduled to open at 10.00am on Tuesday 28 January 2025, at a venue to be confirmed. It is currently expected to sit for no more than six days. The inquiry is timetabled based on the number of days it is likely to take and should any additional sitting days be required for any reason, those days would be timetabled in due course.
4. You will be aware that on 30 July 2024 the Government published a consultation on proposed reforms to the National Planning Policy Framework (the Framework), including draft text for consultation, as well as other proposed changes to the planning system. You will need to address any relevant considerations from the consultation draft Framework in preparing your evidence, or from an updated version of the Framework should it be published by the time the Inquiry opens.

Main Issues

5. Based on the material currently before the Inspector, the main issues are likely to be:
 - Housing land supply / housing demand / housing delivery;
 - The effect of the proposal on the countryside, including with regard to landscape character; and,
 - The effect of the proposal on designated heritage assets.
6. The Inspector has seen comments on the application by interested parties and comments submitted in relation to the appeal. Interested parties and consultees raise a number of additional issues and whether any of these matters are dealt with as main issues in the eventual Decision will depend on the evidence as it emerges in due course. As a reminder, the evidence of the appellant will need to address these matters.
7. The Inquiry will also look at any benefits to be weighed in the planning balance, including any implications of not proceeding with the scheme.
8. It is essential that all parties communicate effectively with one another to seek to narrow the issues for consideration at the Inquiry. This should be an on-going conversation. The parties are therefore requested to give consideration in advance of the case management conference as to whether the identified matters encapsulate those most pertinent to the outcome of the appeal.

Evidence

9. The Inspector reminds the parties that any evidence they wish to rely upon needs to be submitted to the Inquiry at the earliest opportunity. There will be a discussion about this during the case management conference.
10. The Inquiry will focus on areas where there is disagreement. With that in mind, the conference will explore how best to hear the evidence in order to ensure that the Inquiry is conducted as efficiently as possible.
11. The initial thoughts of the Inspector are that the identified main issues set out above would be addressed most effectively by way of formal presentation of evidence followed by cross-examination.
12. Matters relating to planning policy and the overall planning balance, including any benefits of the proposal, would be dealt with through the formal presentation of evidence in chief by the planning witness for each of the main parties, which would be subject to cross-examination.

13. All the above points are included on the case management conference agenda. You are requested to give the above careful consideration in advance of the related discussion at the case management conference. Any request for evidence to be heard other than as currently envisaged will need to be fully justified.

14. As per the [Procedural Guide to Planning Appeals](#), if you use Artificial Intelligence (AI) to create or alter any part of your documents, information, or data, you should state this from the outset, or from the date of this note if not already done. [See the detailed guidance for further information](#).

15. In response to the request from the parties to extend the submission deadline for Proofs of Evidence until 7 January 2025, the Inspector is not inclined to agree to this. The Start letter specifies that Proofs should be submitted '**By 31 December 2024**' and should the Christmas holidays prevent the submission of Proofs on this date, the parties should look to submit before it.

16. The attached Annex sets out the preferred format and content of proofs and other material, which should be observed.

Andrew Parkin
INSPECTOR

15 November 2024

Annex - Content and Format of Proofs and Appendices

Content

Proofs of evidence **should**:

- focus on the main issues identified, in particular on areas of disagreement;
- be proportionate to the number and complexity of issues and matters that the witness is addressing;
- be concise, precise, relevant and contain facts and expert opinion deriving from witnesses' own professional expertise and experience, and/or local knowledge;
- be prepared with a clear structure that identifies and addresses the main issues within the witness's field of knowledge and avoids repetition;
- focus on what is really necessary to make the case and avoid including unnecessary material, or duplicating material in other documents or another witness's evidence; and,
- where data is referred to, include that data, and outline any relevant assessment methodology and the assumptions used to support the arguments (unless this material has been previously agreed and is included as part of the statement of common ground).

Proofs **should not**:

- duplicate information already included in other Inquiry material, such as site description, planning history and the relevant planning policy; and,
- recite the text of policies referred to elsewhere: the proofs need only identify the relevant policy numbers, with extracts being provided as core documents. Only policies which are needed to understand the argument being put forward and are fundamental to an appraisal of the proposals' merits need be referred to.

Format of the proofs and appendices:

- Proofs to be no longer than 3000 words if possible. Where proofs are longer than 1500 words, summaries are to be submitted.
- Front covers to proofs and appendices are to be clearly titled, with the name of the witness on the cover.
- Pages and paragraphs should be numbered.

For **paper copies**

- Proofs are to be spiral bound or bound in such a way as to be easily opened and read.
- Appendices are to be bound separately.
- Appendices are to be indexed using **projecting tabs**, labelled and **paginated**.