

Ms Sarah Scott

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

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Suite 4, 1 King Street
Manchester
M2 6AW

T: 0161 300 6509

www.hsland.co.uk

Our reference:
Berry Hill Road, Adderbury

Email:
matthew.symons@hsland.co.uk

Dear Ms Scott,

PLANNING APPEAL 3255419: LAND OFF BERRY HILL ROAD, ADDERBURY

I am writing to provide you with the following documents in advance of the Hearing on 22/06/2021:

- Planning Statement of Case Update;
- Heritage Note; and,
- Highways Note.

These documents are being submitted with the aim of enabling a more efficient and effective appeal process.

As you will know, upon submitting its Statement of Case on 30/03/2021, the LPA informed the Inspectorate that the LPA and Appellant were in regular liaison and nearing agreement on the Statements of Common Ground. The LPA also informed the Inspectorate that it was hoped that the SoCGs would be finalised well before the scheduled Hearing date (which at that time, was 05/05/2021).

Unfortunately, despite repeated attempts to engage with the LPA on the Planning SoCG, the draft version has been with the LPA since 28/04/2021. The Planning Statement of Case Update (PSoCU) provides a chronology to demonstrate that the Appellant has attempted to finalise the SoCG.

As set out in the PSoCU, the SoCG was due to address key substantive issues in advance of the Hearing. In the absence of a signed SoCG, the Appellant considers it necessary to provide the Inspector with the PSoCU, Heritage Note (HeN) and Highways Note (HiN).

The documents appear substantive at first glance, but this is largely due to appendices. The LPA will be familiar with the majority of the appendices, such as the correspondence, Deddington Committee Report and Banbury appeal decision all appended to the PSoCU.

There are no heritage or highways reasons for refusal and I consider that the enclosed PSoCU, HeN and HiN will clarify the Appellant's position, and indeed that of the LPA and Local Highway Authority, with regard Heritage and Highways respectively. However, please could you ask the Inspector if they would like the Appellant's Heritage and/or Highways consultant to be available to participate in the Hearing? If possible, could you come back to me on this at your earliest convenience as our Heritage consultant is on holiday on 22/06/2021 and will need to make arrangements to be able to participate in the Hearing from her accommodation.

Of course, the Appellant will continue to attempt to finalise the SoCG in advance of the Hearing, along with the Landscape SoCG which has also been with the Council for a significant period of time. However, the Appellant must make you aware that it is considering an application for an award of costs against the Council.

Please could you let me know if you require hard copies of the PSoCU, Heritage Note or Highways Note?

Yours sincerely,

Matthew Symons BA MPlan MRTPI
Planning Manager
On behalf of Hollins Strategic Land

Enc.